

**STATE OF WISCONSIN  
DEPARTMENT OF WORKFORCE DEVELOPMENT  
and  
DEPARTMENT OF HEALTH AND FAMILY SERVICES**


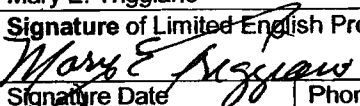
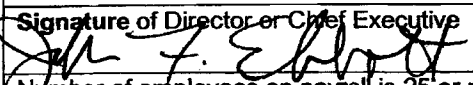
**CIVIL RIGHTS COMPLIANCE PLAN  
for Profit and Non-Profit Entities**

Affirmative Action, Equal Opportunity, and Limited English Proficiency Plan

For the requirements of  
the U.S. Department of Health and Human Services  
and the U.S. Department of Agriculture

**Effective January 1, 2004 to December 31, 2006**

[http://www.dwd.state.wi.us/dws/civil\\_rights/cr0406/cr\\_plans.htm](http://www.dwd.state.wi.us/dws/civil_rights/cr0406/cr_plans.htm)

Recipient Legal Action of Wisconsin, Inc.			
Address (include zip code and county) 230 West Wells Street Room 800, Milwaukee WI 53203 Milwaukee County			
Print Name of Equal Opportunity Coordinator Michael J. Maher		Print Name of Limited English Proficiency Coordinator Mary E. Triggiano	
Signature of Equal Opportunity Coordinator 		Signature of Limited English Proficiency Coordinator 	
Signature Date 2-9-04	Phone Number (414) 278-7777	Signature Date 2-16-04	Phone Number (414) 278-7722
Email mjm@legalaction.org		Email met@legalaction.org	
Print Name of Director or Chief executive John F. Ebbott		Email jfe@legalaction.org	Phone Number (414) 278-7777
Signature of Director or Chief Executive 			Signature Date 2/10/2004
Number of employees on payroll is 25 or more? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Amount of contract totals \$25,000 or more? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

**A HARD COPY OF THIS COMPLETED PAGE MUST BE RETURNED  
TO THE APPROPRIATE STATE AGENCY PROGRAMS COVERED BY PLAN**

**Departments of Workforce Development  
and Health and Family Services  
Civil Rights Compliance Plan**

**TABLE OF CONTENTS**

	<b>Page</b>
<b>Programs Covered by the Plan</b>	<b>1</b>
<b>Civil Rights Compliance Plan</b>	<b>2</b>
Data Collection	2
Recruitment Strategies and Action Plan	2
Workforce Analysis	2
Equal Opportunity Requirements	5
Customer Service Population Analysis	5
Definitions for Customer Analysis	5
Summary for Customer Analysis	6
Policy Statement and Notification	7
Designation of Equal Opportunity Coordinator	8
Access to Services	8
Discrimination Complaint/Grievance Procedure	9
Self-evaluation	10
Limited English Proficiency Requirements	11
LEP Customer Service Language Access Analysis	12
Definitions for LEP Analysis	12
Summary of LEP Customer Analysis	13
Identification of and Services for LEP Language Groups	13
Statement and Notification	14
Designation of Limited English Proficiency Coordinator	15
Access to LEP Services	15
LEP Complaint/Grievance Procedure	16
LEP Self-evaluation	17
<b>Attachments</b>	<b>18</b>
Attachment 1: Affirmative Action Policy	18
Attachment 2: Notice to Vendor Filing Information	21
Attachment 3: Equal Opportunity Policy and Translations	25
English	
Spanish	
Hmong	
Attachment 4: Limited English Proficiency and Translations	28
English	
Spanish	
Hmong	
Attachment 5: Discrimination Complaint Forms/Process	41
English	
Spanish	
Hmong	
Attachment 6: Letter of Assurance Model	57

## Programs Covered by the Plan

### DWD, Division of Workforce Solutions Programs and Services

Please specify the program and grant contract.

<input checked="" type="checkbox"/> Wisconsin Works (W-2)	<input type="checkbox"/> Food Stamp Employment & Training Program
<input type="checkbox"/> Child Support	<input type="checkbox"/> Refugee Programs
<input type="checkbox"/> Child Care	<input checked="" type="checkbox"/> Other (specify): W-t-W, WIA, TANF

### Department of Health and Family Services Programs and Services

Please specify the program and grant contract.

<input type="checkbox"/> Adoption and Foster Care	<input type="checkbox"/> Food Stamps
<input checked="" type="checkbox"/> Aging	<input type="checkbox"/> Home Consultation Services for Child-related Programs
<input type="checkbox"/> Programs and Services for the Blind	<input type="checkbox"/> Long Term Care
<input type="checkbox"/> Chronic Disease and Health Prevention	<input type="checkbox"/> Medicaid Health Care, BadgerCare, SeniorCare, FamilyCare
<input type="checkbox"/> Communicable Diseases	<input type="checkbox"/> Mental Health
<input type="checkbox"/> Programs/Services for Deaf & Hard of Hearing	<input type="checkbox"/> Milwaukee Child Welfare Program
<input type="checkbox"/> Developmental Disability	<input type="checkbox"/> Occupational Health
<input type="checkbox"/> Disability Determination (SSI/SSDI)	<input type="checkbox"/> Regulations and Licensing for Child Care, Group Foster Homes and Child Welfare
<input type="checkbox"/> Emergency Medical Services and Injury Prevention	<input type="checkbox"/> Substance Abuse
<input type="checkbox"/> Environmental Health	<input checked="" type="checkbox"/> Other (specify): HCFA
<input type="checkbox"/> Family Health and Community Health	<input checked="" type="checkbox"/> Other (specify): State Benefit Specialist

### Other DHFS Type A Programs

See Single Agency Audit requirements for description of Types.

<input type="checkbox"/> Brain Injury, Community Supported Living Arrangement	<input type="checkbox"/> Community Options Program Waivers (COP-W)
<input type="checkbox"/> Case Management Agency Provider/ Wisconsin Medical Assistance Program	<input type="checkbox"/> Long Term Care/Family Care
<input type="checkbox"/> Community Integration Program IA, IB (CIP IA, CIP IB)	<input type="checkbox"/> Medicaid Personal Care Program
<input type="checkbox"/> Community Integration Program II (CIP II)	<input type="checkbox"/> Other (specify):

Technicians					
Sales Workers					
Office & Clerical Workers	319783	252615	79.00%	24476	7.65%
Craft Workers					
Operatives					
Laborers					
Service Workers					

**Step 2 - Workforce Analysis of Your Agency:** Employees include all full-time, part-time and temporary employees that you employ in Wisconsin within one year of receiving the State of Wisconsin contract. If your agency belongs to a multi or international corporation, report only the number of employees actually working in Wisconsin. Individuals who work for your organization under a vendor's contract are NOT considered your agency's employees.

JOB CATEGORIES	Workforce Employee Totals	Females		Minorities	
		Totals	%	Totals	%
Officials & Managers					
Professionals	46	27	58.70	8	17.39
Technicians			%		%
Sales Workers					
Office & Clerical Workers	51	38	74.51	20	39.21
Craft Workers			%		%
Operatives					
Laborers					
Service Workers					
<b>Totals</b>					

**Step 3 - Analysis for Under-representation by Job Groups in Your Agency:** By comparing the representation of minorities and women in your workforce with their representation in the labor market, you will determine which, if any, job categories are under-represented. To compute the variance between the representation in the Labor Market Area as it compares with your agency's workforce, take the labor market percentage of the Job Group for each protected group and subtract this percentage from your workforce percentage.

Variance = (Agency Workforce % - Labor Market %)

a) For Women:

	<i>From Step 1</i>	<i>From Step 2</i>	
Job Categories	Labor Market Percentage (a)	Workforce Percentage (b)	Variance (+/-) b-a
Officials & Managers			
Professionals	54.91%	58.70%	+3.79%
Technicians			
Sales Workers			
Office & Clerical Workers	79.00%	74.51%	-4.49%
Craft Workers			
Operatives			
Laborers			
Service Workers			

Please see attached affirmative action plan. Legal Action has a slight over-representation of males in the office clerical job category. This is not necessarily a problem because there is an over-representation of females in this lower-paying job category for the entire labor market. Females comprise 47.58% of the total labor force but are 79% of the office and clerical workers. In this job category, Legal Action's work force more closely matches the general population than the total labor force.

These Affirmative Action goals are directed towards achieving a balanced workforce. The nature of these goals is contingent upon the nature of any under-representations of women, minorities, and persons with disabilities in any of the job categories/groups of the recipient's workforce. Each goal must:

- ◆ Be specific;
- ◆ Have an implementation target date of between six months and two years; and
- ◆ Have a plan of action or description of a procedure to implement the goal.

**Note: To submit the AA Plan,** please attach separately the Affirmative Action plan that will reflect your agency's strategy and recruitment plan for a qualified and competent balanced workforce. The agency does not need to submit an AA Plan if its workforce is balanced. Attachment 1 provides a model for an Affirmative Action Plan.

## **C. EQUAL OPPORTUNITY REQUIREMENTS:**

### **1. Customer Service Population Analysis**

#### **a) Data for customer analysis:**

- 1) To calculate the number and percentage for all minorities, write out the numbers for each minority category and combine these as the sum used to calculate the percentage of minorities compared to the total eligible population in the service area.
- 2) Note to Subrecipients of Profit and Nonprofit: If you are defined as a county or municipality for the purpose of this Plan, please refer to the CRC Plan for counties and municipalities. Non-governmental subrecipients of counties and other municipalities, whose only customers are county referrals, should report the population served as the eligible population likely to be encountered as well as the population served. You may disregard the computation for the variance.

#### **b) Definitions for Customer Analysis:**

- 1) **"Eligible Population Served"** means the number of participants who are enrolled or registered in a program or service administered by a recipient. For purposes of reporting, use the number of participants within a one-year calendar period.
- 2) **"Eligible Population Likely to be Encountered"** means the total number of individuals in the service area who may meet the eligibility requirements of a recipient's program, whether or not they are currently being served.
- 3) **"Percent of Eligible Population Likely to be Encountered"** is computed by dividing the number of each category (combined race/ethnicity, females, and persons with disability) likely to be encountered by the total number of eligible population likely to be encountered in the service area.

What can be tried to improve participation?

In mid- 2003, Legal Action started collecting data on the disability status of clients. Client data is not available for 2002.

If denials for service have been disproportionate within the last 24 months, please explain:  
N/A

How many discrimination complaints were filed within the last 24 months?  
No client discrimination claims were filed in the last 24 months.

Please comment on the **nature** of the discrimination complaints filed, both formal and informal and their resolution:  
N/A

**This analysis was prepared by:**

Name Michael J. Maher	
Title Administrator	Date 01/30/04

## **2. Policy Statement and Notification**

a) Our agency is utilizing the DWD/DHFS model for Equal Employment Opportunity and Civil Rights Policy Statement that is provided in Attachment 3 of this plan, including the translations required in accordance with LEP Plan for vital documents.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b) Instead of utilizing the model Equal Rights Policy Statement, we have provided our own Equal Rights Policy Statement as Attachment 3 of this plan, including the translations required in accordance with LEP Plan for vital documents.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
c) We will disseminate the policy statement in the following ways:	
1) The policy is included in policy and operating procedures manual.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2) The policy is permanently posted where both current customers and applicants for services may review it.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3) The policy is reviewed annually by managers, supervisors and staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4) New employees and managers are informed of the policy as part of their orientation program and in-service training. New staff will receive training on the policy, along with instruction on the laws and regulations concerning equal opportunity in employment and service delivery. Copies of the laws and regulations are made available to staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5) Staff refresher training for updates are required once every three years.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6) The policy is available in alternate formats upon request (i.e., relevant language translations, large print, on tape, Braille). If electronic information is used exclusively, text to voice and voice to text software is provided for persons with sensory or physical disabilities as requested.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7) A short form of the policy is included in recruitment materials, use of media, publications, phone listings, and directories.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8) The policy is incorporated in contracts and agreements with vendors and contractors for services.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9) Customer referral sources are notified of the policies.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

1) Providing equal access to all programs, services or activities, including but not limited to eligibility, treatment, staff assignments, outreach, intake, diagnosis, assessment, evaluation, research, days and hours of service, facilities assignments, communication of information and referrals to other services.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2) Assuring physical access to the facilities by allowing persons with functional limitations caused by impairments of sight, hearing, coordination or perception, or persons with semi-ambulatory or non-ambulatory disabilities to enter, leave, circulate within, use public toilet facilities and elevators.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3) Providing language interpreters and/or sign interpreters to assist applicants and customers with limited ability to read, speak or understand English or those who are deaf or hard of hearing.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4) Providing literature, posting information and audio-visual materials in language(s) understood by customers, and in formats that are understandable to persons with visual or hearing impairments.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5) Providing readers or assistive technology for persons with visual impairments.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6) Providing special assistance for persons with developmental or learning disabilities.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7) Providing services to an eligible applicant or participant who are in a protective status (i.e., eligible immigrants), informing them that information regarding their immigration status will not be reported to other federal agencies, and will not be used to discriminate against them.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8) Ensuring that members of protected classes have equal opportunity to participate on planning and advisory boards on local levels through notification of membership opportunities.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9) Allocating funds in a non-discriminatory manner.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10) Providing equal opportunity for applicants to become vendors, grantees and sub-grantees, and contractors. Using non-discriminatory factors in determining awards, sizes of grants, contracts, projects, and the quality, quantity, range of benefits provided in proportion to the number of such members in the service area.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
11) Establishing program service areas to integrate members of protected classes.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12) Treating protected class members with full courtesy and respect in all personal, oral, written and other forms of communication and contract.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
13) Providing culturally competent bilingual and/or bicultural qualified staff and specialized services so as to maximize use and completion of the program by the protected class.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
14) Ensuring that sanctions and terminations are applied in a culturally sensitive, non-discriminatory manner without regard to protected status.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
15) Provide access through Telecommunication Device for the Deaf (TDD) or Wisconsin Relay Service (WRS) for the deaf and hard of hearing participants upon request.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

*If you responded "No" to any of the above questions in the space below, describe your plan for addressing these requirements, including target dates for completion of major milestones:*

##### **5. Discrimination Complaint/Grievance Procedure**

If you responded "No" to any of the above questions in the space below, describe your plan for addressing these requirements, including target dates for completion of major milestones. Questions 5(a) & (b), Legal Action utilizes the model complaint forms but also uses the Legal Action client grievance procedures. Legal Action will have the Spanish and Hmong translations of the referenced documents by 4/30/04. Questions (4),(5),(9), (10) & (12), Legal Action is in the process of reconciling the deadlines in the model with the Legal Action client and employee grievance procedures. Anticipated completion of reconciliation process is 6/03/04.

## 6. Self-Evaluation

a) Our organization annually evaluates and revises its service delivery and employment practices according to the following procedures:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
1) Conduct a self-evaluation with consultation from interested persons, including persons or organizations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2) Modify any policies or practices that do not meet the standards for equal opportunity in employment or service delivery.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3) Take appropriate remedial steps to eliminate the effects of any discrimination or adverse impact that resulted from past policies or practices.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4) Maintain records of the evaluation process, including the names of interested persons who were consulted, a description of the areas examined and any problems identified, and a description of remedial steps taken and/or modifications made. Make records available to monitoring staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5) Review data on customers served within programs, services or activities, by racial and ethnic status, gender, age, disability status, in proportion to their representation in the eligible service area population, and determine that no person is excluded from participation, denied any benefits, or subjected to discrimination. Data analysis will include comparisons of applicants, eligibles, non-eligibles, persons terminated from service, and bilingual staff persons.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6) Compare racial and ethnic, gender, and disability workforce statistics in proportion to their representation in the local labor market.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7) Monitor reasonable accommodation procedures for employees with disabilities.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8) Make improvements to facilities as reasonable and necessary, providing physical accessibility to persons with disabilities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9) Monitor the civil rights and equal employment opportunity compliance of subgrantees, sub-contractors and/or vendors on a biennial basis.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10) Assess needs of members of protected groups and measure the extent to which services are actually delivered to members of the protected classes in a culturally relevant and accessible manner.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
11) Assess representation by members of protected classes for boards, councils, volunteers, and subgrantees. Appropriate Federal Office for Civil Rights (depending on the source of federal funds).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12) Maintain reports of providers, grantees, sub-grantees, and vendors' compliance and steps to achieve compliance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
13) Maintain reports of all complaints by name, address, date, nature, and investigation status. These reports must be accessible during on-site visits.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

If you responded "No" to any of the above questions in the space below, describe your plan for addressing these requirements, including target dates for completion of milestones.



- a) You should assume that you need a policy and plan for providing oral interpreters for all the LEP populations you serve and the LEP populations likely to become your customers, patients, residents or clients.
- b) Analysis for Oral and Written Translation Needs:

**Customer Service Language Access Data**

See Attachment 8

Population in service area	LEP population likely to be encountered in service area (a)	** LEP population served in service area (b)	Percent of LEP served b/a x 100	Is written translation of vital documents necessary? Yes or No	Written notice for interpreter services sufficient? Yes or No
Languages Spoken	See Attachment 9 Number	Number	%	If LEP pop. is 5% or greater than 1000	If LEP pop. is 5% and less than 50
Spanish	168778	383	.226	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Hmong	30569	64	.209	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Russian	5362	3	.055	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Bosnian/Serbian /Croatian	4988	4	.080	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Somali	0	0	0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Laotian	3314	48	1.448	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Other (specify): See attached DWD for (a) #'s	155701	208	.134	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

- \* Not applicable since population is less than 5%.
- c) Definitions for LEP Analysis: \*\* Column B numbers are from 2003. Legal Action is refining its client data base to capture a more complete picture of
- 1) **"LEP Population in Service Area"** means the total number of eligible LEP participants who meet the eligibility requirements of the recipient's program, whether or not they are currently being served. services to LEP clients. We anticipate that the 2004 numbers will be substantially higher.
  - 2) **"LEP Population Served"** means the actual number of LEP participants who are enrolled or registered in the recipient's program or services.
  - 3) **"Percentage of LEP Population Served"** is computed by dividing the number of LEP population actually served by the total number of LEP population encountered.
- d) Summary of LEP Customer Analysis:

Service Area
Statewide Analysis of LEP Population by DWD & DHFS
Data Source(s)
DWD: LEP Populations by County and Language: 2000 Census LAW 2003 Closed Cases
Data From Previous 12 Months
From: 01/01/03 To: 12/31/03

Please comment on the nature and resolution of LEP related discrimination complaints filed, both formal and informal:  
No complaints.

This analysis was prepared by:

4) New employees and managers are informed of the policy as part of their orientation program and in-service training. Staff will receive training on the policy, along with instruction on the laws and regulations concerning language access. Copies of the laws and regulations are made available to staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5) Staff are required to attend refresher training session once every three years.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6) The policy is available in alternative formats (i.e., relevant language translations, large print, on tape, Braille) upon request. If electronic information is used exclusively, text to voice and voice to text software is provided for persons with sensory or physical disabilities if requested.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7) A short form of the policy is included in recruitment material, use of media, publications, phone listings and directories.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8) The policy is incorporated in contracts and agreements with vendors, contractors, and suppliers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9) Customer referral services are notified of the policies.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

*If you responded "No" to any of the above questions, describe your plan for addressing this requirement, including target date for completion:*

Question c(7), Legal Action is in the process of adding the policy to materials as they come up for reprinting or renewal. We hope have the updating completed by 12/31/04.

#### **6. Designation of Limited English Proficiency (LEP) Coordinator**

a) A management level employee has been appointed to the position of Limited English Proficiency Coordinator (LEPC).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b) Our LEPC has direct access to the organization head to discuss LEP issues or activities.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
c) Our LEPC has received or will receive LEP rights training within six months of assuming Limited English Proficiency Coordinator responsibilities.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
d) The name of our LEPC is typed on the cover page and the individual has signed the cover page indicating an understanding of his/her responsibilities.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
e) Our LEPC has the following responsibilities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
1) Handling language access complaints.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2) Disseminating language access information to provider staff and interested persons.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3) Preparing language access plans and reports.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4) Monitoring, conducting compliance reviews and evaluating language access activities in the organization.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5) Providing monitoring, and evaluating language access sensitivity and training needs for providers and staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7) Providing input to management to improve language access.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6) Where language access functions relate to equal opportunity, the LEPC and the Equal Opportunity Coordinator will plan and carry out functions in unison.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

*If you responded "No" to any of the above questions, describe your plan for addressing this requirement, including target date for completion:*

#### **7. Access to Services**

11) Where language access relates to equal access to services, coordinate functions with the Equal Opportunity policy and related plans.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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*If you responded "No" to any of the above questions, describe your plan for addressing this requirement, including target date for completion:*

Question #8: Legal Action uses the rules adopted by the Wisconsin Supreme Court for Court Interpreters.

### 8. LEP Discrimination Complaint/Grievance Procedure

a) Our organization will implement the following procedures:	
1) The procedures for the resolution of complaints regarding language assistance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2) The utilization of the equal opportunity discrimination complaint/grievance procedures for alleged discrimination complaints and/or grievances involving language access.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

*If you responded "No" to any of the above questions, describe your plan for addressing this requirement, including target date for completion:*

### 9. Self-Evaluation

a) Our organization annually evaluates and revises its service delivery and employment practices according to the following procedures.	
1) Conduct an annual self-evaluation of language access policies, procedures and services and modify those requiring improvement.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2) Maintain records of the evaluation process, including the names of interested persons who were consulted, a description of the areas examined and any problems identified, and a description of remedial steps taken and/or modifications made. Make records available to state and federal staff.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3) Review data on customers served and service complaints; translator and interpreter providers and their quality of service; and training activities and LEP costs. Provide recommendations for improvement in future plans.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4) Coordinate with equal opportunity policies and related plans where language access relates to equal opportunity and service delivery.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

*If you responded "No" to any of the above questions, describe your plan for addressing this requirement, including target date for completion:*

## ATTACHMENT 1

### AFFIRMATIVE ACTION POLICY

It is the policy of (Organization Name) Legal Action of Wisconsin, Inc. to implement Affirmative Action (AA) measures designed to eliminate present effects of past discrimination and to ensure equal opportunity for women, racial or ethnic minorities, and persons with disabilities. Legal Action of Wisconsin, Inc. (organization) recognizes the need to identify job groups and classifications with under-representation, and to set goals and timetables for increasing the employment of under-represented groups; and to develop an AA Plan for implementing those reasonable goals through outreach, recruitment, training and other activities and commitments.

Our AA goals include:

Please see pages 11 & 12 of December 2003 Director's Report to Personnel Committee on Equal Opportunity/Affirmative Action Statement.

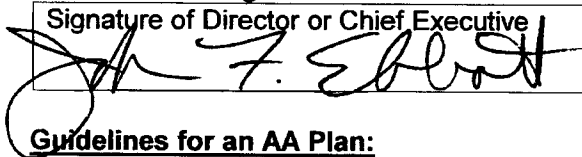
The AA Plan will be disseminated in the following ways:

The Plan is distributed to all staff in the staff manual and the Policy Statement is posted in all client service waiting rooms.

Internal Monitoring will be done.

Signature of Director or Chief Executive

Date Signed



2/10/2004

#### Guidelines for an AA Plan:

##### **Affirmative Action Strategies and Recruitment Plans.**

- ◆ Be specific;
- ◆ Have an implementation target date of between six months and two years; and
- ◆ Have a plan of action or description of a procedure to implement the goal.
- ◆ **SAMPLE OF GOALS** that a recipient may include in its Affirmative Action Plan are (Note: a recipient may use its own goals or use one or more of these suggested goals):
- ◆ Developing a company affirmative action committee to advise the chief executive officer on affirmative action issues.
- ◆ Reviewing job descriptions to ensure that they reflect actual job duties with reasonable work-related requirements for employment.
- ◆ Restructuring jobs, where possible, to encourage appointing trainees.
- ◆ Broadening recruitment notices to include community organizations likely to refer women, minorities, and individuals with disabilities.
- ◆ Advertising position vacancies in minority media.
- ◆ Developing interview teams for all positions using only job-related questions.
- ◆ Implementing an exit interview program or an employee assistance program.
- ◆ Developing work schedules where feasible that include part-time employment opportunities to encourage employment of persons for whom full-time employment is difficult.
- ◆ Identifying an informal equal employment complaint resolution procedure.
- ◆ Identifying other means to strengthen its recruitment and retention of women, minorities, and individuals with disabilities.
- ◆ Conducting onsite training on affirmative action issues and initiatives.
- ◆ Committing to recruit and appoint women, minorities and individuals with disabilities for vacancies in the same percentage as they are available in the labor market when the recipient has turnover or a need to expand its workforce.

#### **PLAN DISSEMINATION**

If a vendor asserts that all of its Affirmative Action Plan is confidential, the vendor is responsible for defending its confidentiality under Wisconsin Statutes. The vendor must agree in advance in writing to hold the State of Wisconsin harmless and to provide for any necessary defenses of the confidentiality of the vendor's records, if a challenge occurs.

## ATTACHMENT 2

Wisconsin Department of Administration  
s.16.765, Wis. Stats., ADM 50  
DOA-3607

### Notice to Vendor Filing Information

When a vendor complies with the State of Wisconsin Contract Compliance Law requirements, the vendor is included in the Wisconsin Office of Contract Compliance (WOCC) Vendor Directory. The vendor is identified in the Vendor Directory as an eligible vendor for three years or the life of the contract, whichever is longer. If an eligible vendor receives another award from the State of Wisconsin prior to expiration of this eligibility, that vendor need not submit other contract compliance information. The vendor is identified in the Vendor Directory by name and Federal Employer Identification # (FEIN) or Social Security # (SS#). We are requesting your approval to include your company, with the FEIN# or SS# in the Vendor Directory.

**Vendor Name:** Legal Action of Wisconsin, Inc.

**FEIN:** 39-1077192

**Social Security Number:**

The number given is a (Please check one):

- ☒ Federal Employer Identification Number  
☐ Social Security Number

- 
- ☒ Yes, I consent to the State of Wisconsin using this Federal Employer Identification or Social Security Number to identify my business in the "Wisconsin Office of Contract Compliance Vendor Directory" included on the State VendorNet service on the Internet.  
☐ No, I do not consent to the State of Wisconsin using the Federal Employer Identification Number or Social Security Number to identify my business in the "Wisconsin Office of Contract Compliance Vendor Directory" included on the State VendorNet service on the Internet.

**PLEASE NOTE:** a "No" will result in NOT including your organization in the WOCC Vendor Directory. This will mean that each State agency, contracting with your organization for more than \$25,000, must request contract compliance information from you each time that an agency enters into such a contract.

  
Signature

2-9-04  
Date

**Name:** Michael J. Maher, Administrator

**E-mail:** mjm@legalaction.org

**Telephone:** (414) 278-7777

Vendors must submit this form along with all other required information to the State of Wisconsin agency with which it is contracting.



Signed	Date	Agency
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## ATTACHMENT 3

### EQUAL OPPORTUNITY POLICY

(Organization Name) Legal Action of Wisconsin, Inc. is in compliance with the equal opportunity policy and standards of the Department of Workforce Development, Department of Health and Family Services and all applicable state and federal statutes and regulations relating to nondiscrimination in employment and service delivery.

No otherwise qualified person shall be excluded from employment, be denied the benefits of employment or otherwise be subject to discrimination in employment in any manner on the basis of age, race, religion, color, sex, national origin or ancestry, disability or association with a person with a disability, arrest or conviction record, sexual orientation, marital status or pregnancy, political belief, or affiliation, military participation, or use or non use of lawful products off the employers premises during working hours. All employees are expected to support goals and programmatic activities relating to nondiscrimination in employment.

No otherwise qualified applicant for service or service participant shall be excluded from participation, be denied benefits, or otherwise be subject to discrimination in any manner on the basis of race, color, national origin or ancestry, sex, religion, age, political belief or affiliation, disability or association with a person with a disability. This policy covers eligibility for the access to service delivery, and treatment in all of the programs and activities.

To assist us in complying with all applicable equal opportunity rules, regulations and guidelines, I have

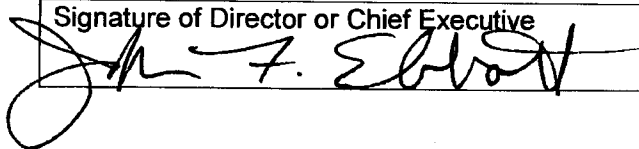
appointed Michael J. Maher, (Title) Administrator  
as Equal Opportunity Coordinator. You are encouraged to discuss any perceived discrimination problems in employment or service delivery with this employee.

(Mr./Ms.) Mr. Michael J. Maher may be reached on (Days) Monday through Friday

\_\_\_\_\_ from (Hours) 8 a.m. to 5 p.m. at (Telephone Number) (414) 278-7777

Information about discrimination complaint resolution process is available to you upon request.

Signature of Director or Chief Executive



Signature Date

2/10/2004

## ATTACHMENT 3

### CAI PHEEJ XEEB

(Equal Opportunity Policy)

(Npe Koomhaum/Chaw Ua Hauj Lwm) Legal Action of Wisconsin, Inc.

ua raws nraim li txoj cai pheej xeeb ntawm xeev Wisconsin Department of Workforce Development, Division of Workforce Solutions, and Department of Health and Family Services, Lub Chaw Ua Kam Pab Tsoom Neeg thiab Kev Noj Qab Haus Huv thiab lwm txoj cai ntawm xeev thiab tseem fwm uas hais ntsig txog tsis pub muaj kev ntsub ntxaug nyob hauv kev ua hauj lwm thiab kev pabcuam.

Tsis pub kom tus neeg uas muaj peev xwm ua tau raug cais tawm ntawm kev ua hauj lwm, tsis tau txais cov kev pab los ntawm kev ua hauj lwm los yog poob rau kev ntsub ntxaug hauv kev ua hauj lwm vim lub hnuv nyoog, caj neeg, kev ntseeg, cev nqaij daim tawv, txawm xeeb, haiv neeg, los yog caj ces, sav zeej, cev ntaj ntsug tsis xwm yeem, lwm yam mob rau txoj kev loj hlob, raug txhom raug ntes, kev ples kev yi, kev ua txij nkawm, los yog ua peeb zeej tub rog. Tag nrho cov neeg ua kam yuav tsum tau pab txhawb peb lub hom phiaj thiab lwm yam dej num uas kis txog kev ntsub ntxaug nyob hauv kev ua hauj lwm.

Tsis pub kom tus neeg uas muaj peev xwm ua tau raug cais tsis pub koom tes, tsis tau txais cov kev pab, los yog poob rau kev ntsub ntxaug vim caj neeg, cev nqaij daim tawv, haiv neeg, txawm xeeb, kev ntseeg, hnuv nyoog los yog sav xeeb. Txoj cai no siv rau ntau yam xws li kev tsim nyog tau txais kev pab thiab kom tau txais los yog muaj kev pab yooj yim, thiab kom tau txais kev kho mob nkeeg uas muaj nyob rau hauv cov kev pabcuam thiab lwm yam.

Qhov yuav pab kom peb ua tau raws li cov cai pheej xeeb thiab lwm cov cai, kuv tau xaiv

Michael J. Maher, (Title) Administrator

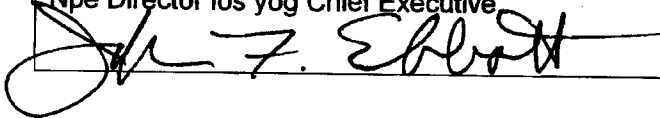
los ua tus Equal Opportunity Coordinator. Kav tsij mus nrog tus neeg no tham yog koj xav tias tau ntsib kev ntsub ntxaug rau kev ua hauj lwm los yog kev pabcuam. Koj hu tau rau (Mr./Ms.)

Mr. Michael J. Maher hnuv 8:00 a.m. to 5:00 p.m.

txij li thaum Monday through Friday, ntawm tus xov tooj (414) 278-7777

Peb muaj cov ntaub ntawv qhia txog txoj kev daws kev tsis txaus siab rau kev ntsub ntxaug pub rau koj yog koj nug txog.

Npe Director los yog Chief Executive



HNUB, HLI & XYOO

2/10/2004

**HMONG EQUAL OPPORTUNITY POLICY**

DWSD-12998-E-H (R. 11/2003)

**B. Implementation**

Legal Action of Wisconsin will not, on the ground of race, color, creed, ancestry, sex, age, national origin, disability, marital status, sexual orientation or any other consideration prohibited by law:

1. Deny legal assistance to any eligible person;
2. Treat differently any person in determining whether he or she is eligible for assistance;
3. Deny a person the opportunity to participate as a member of a policy-making, planning, or advisory body; or
4. Establish legal services offices at locations for the purpose of excluding persons from the benefits of legal assistance.

**IV. Equal Opportunity in Employment/Affirmative Action**

**A. Policy**

It is the policy of Legal Action of Wisconsin, Inc. to aggressively and creatively seek and employ qualified persons, to provide equal opportunities in all aspects of employment, and to administer all personnel activities in a manner which does not discriminate against any person because of race, color, creed, ancestry, sex, age, national origin, disability, marital status, sexual orientation or any other consideration prohibited by law. All hiring, placement, promotion, reduction in force and recall of applicants and employees will be made on the basis of individual ability and performance, and the staffing needs of the program consistent with the commitment to Equal Opportunity that is set forth in this statement. All hiring, placement, promotion, reduction in force and recall activities will be monitored by the program to assure that full consideration has been given to all qualified minority and women applicants and employees. To the extent allowed by law, this paragraph shall be construed consistent with any existing collective bargaining agreement.

**B. Attorney Hiring**

1. Job Announcement - Content. All job announcements shall identify Legal Action of Wisconsin, Inc. as an Equal Opportunity/Affirmative Action Employer. All qualifications for employment shall be stated in the job announcement. The job announcement shall provide specific information as to each program location in which a position is or may be available, including the characteristics of the client population and

those clients, prior legal work in the client community or other programs to aid low-income persons, ability to communicate in Spanish, and cultural similarity with the client community.

4. **Job Testing.** Persons hired for attorney positions will, unless licensed to practice in the State of Wisconsin, be required to pass the bar examination at the earliest possible opportunity. Persons licensed to practice elsewhere will be required to apply for and receive a license to practice in Wisconsin. Writing samples must be submitted by candidates for attorney positions.

5. **Screening and Evaluation of Applicants**

- a. **Hiring Committee** - A hiring committee consisting of attorney staff members will assist the Executive Director in interviewing and evaluating applicants.
- b. **Evaluation** - The screening and interviewing process will take into consideration the qualifications set forth in the job announcement. While legal writing ability, academic training and performance as well as the nature and extent of prior legal experience are considered, review of the applicants shall also consider the applicants' knowledge and understanding of the legal problems and the needs of low-income persons, commitment to providing legal services to low-income persons, prior legal work in the client community or in other programs to aid low-income persons, ability to communicate in Spanish, and cultural similarity with the client community. Applicants shall be informed that Legal Action is seeking persons willing to stay with the program a sufficient amount of time to make a contribution, noting that a substantial amount of program resources is required to provide training. A specific time commitment of up to two years may be requested.

6. **Benefits and Compensation**

- a. All compensation and fringe benefits, including access to training and educational programs for employees, shall be determined without regard to race, color, creed, ancestry, sex, age, national origin, disability, marital status, sexual orientation or other consideration prohibited by law.
- b. Within the financial limitations of the firm, Legal Action will strive to provide regular salary increases for attorney staff as

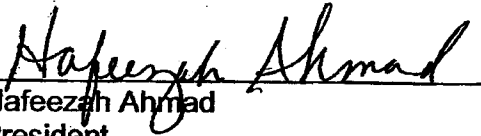
All job announcements shall be provided to members of the Board of Directors and Community Advisory Committees. Job announcements also shall be posted at every office of Legal Action of Wisconsin, Inc.

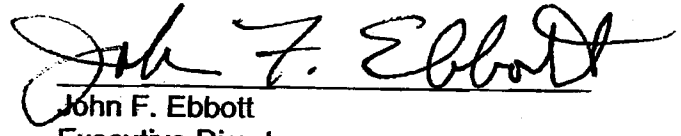
3. Qualifications. Qualifications for hiring in non-attorney positions shall be limited to those related to the ability to perform the functions of the position.
4. Testing. All secretarial candidates shall be required to take a speed typing test as well as a legal form typing test. The administrative and paralegal candidates must also produce writing samples.
5. Promotion. To ensure promotion opportunities, positions shall be posted only within the program upon the determination that the position must be filled immediately and it is likely that a current employee may be able to assume the position with little training.
6. Reduction in Force. Consistent with the compelling need to maintain a high level of services for the low-income population served, reductions in personnel and recall to work thereafter shall include consideration of performance, qualifications, nature and extent of experience with Legal Action, knowledge and understanding of the legal problems and needs of low-income persons and commitment to providing legal services to those clients, ability to maintain effective communication and empathy with low-income persons, including bilingual requirements, ability to work with culturally diverse clients, and relationships and empathy with the client communities served as set forth in this statement. In addition, where relevant, prior supervisory or management experience may also be utilized in reduction considerations. To the extent allowed by law, this paragraph shall be construed consistent with any existing collective bargaining agreement.
7. Benefits and Compensation. All compensation and fringe benefits including access to training and educational programs for employees shall be determined without regard to race, color, creed, ancestry, sex, age, national origin, disability, marital status, sexual orientation or other consideration prohibited by law.

## **V. Audits and Reports**

- A. A statistical report analyzing the composition of Legal Action staff by race and sex is attached as an appendix. This report shall be updated annually as of December 31st.

These policies approved by the Board of Directors on January 10, 2004 will be revised to reflect experience, changes in laws, and regulations and any better understanding of effective approaches that will assure equal opportunities to all.

  
Hafeezah Ahmad  
President

  
John F. Ebbott  
Executive Director

Q:\Admin\POLICY\EE0\2003\EE0 STATEMENT 1-04 Final.wpd

- Whistles, catcalls and sexual references.
- Repeated pressure on an employee to socialize with or date another individual.
- Asking personal questions about a person's sexual life or spreading malicious gossip about a person's sexual life.
- Making sexual comments or innuendoes, telling jokes or stories of a sexually demeaning, offensive or insulting nature.
- Deliberate display of sexually offensive or graphic material which is not necessary for business purposes.
- Posters, calendars, cartoons, photographs or art work of a sexual, hostile or degrading nature.
- Granting or withholding pay increases, promotions, job offers or other employment issues based on sex.

"Harassment" also includes:

- Engaging in criminal conduct or acts of violence, or making threats of violence toward anyone on Employer premises or at any time for any purpose; fighting, or provoking a fight on Employer property, or negligent damage of property.
- Threatening, intimidating or coercing fellow employees.

We are aware that conduct which might be offensive to some individuals might be considered inoffensive by others. Because of this, it is difficult for managers or supervisors to learn of and take effective action to halt harassment unless the affected individual alerts a manager or supervisor both to the occurrence and the fact that the conduct in question is offensive or unwanted.

With this in mind, we make several options available if you feel you have been subjected to or witnessed harassment of any kind, even if you consider it minor. We need your cooperation to make this policy as effective as possible. We encourage you to approach the alleged harasser and ask him/her to immediately stop the offensive activity. The alleged harasser may not know how you or others feel. This step is **not required** if it makes you feel uncomfortable, in danger, or is not effective.

## ATTACHMENT 4

### LIMITED ENGLISH PROFICIENCY POLICY DEPARTMENT OF WORKFORCE DEVELOPMENT

#### POLICY STATEMENT

The (agency name) Legal Action of Wisconsin, Inc. is committed to:

Providing equal opportunity in all programs and services to ensure full compliance with all civil rights laws, including Title VI of the 1964 Civil Rights Act, which requires non-discrimination on the basis of national origin. Equal opportunity includes physical and program access for persons with disabilities and program access for persons with Limited English Proficiency (LEP). Program and physical access for persons with disabilities is covered in the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973 as amended, Section 504.

It is the policy of this agency to provide language access services to populations of persons with Limited English Proficiency (LEP) who are eligible to be served encountered by our programs. Such services will be focused on providing meaningful access to our programs, services and/or benefits.

#### DEFINITIONS

The following definitions and other provisions are applicable to this policy:

- **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d.et seq. And its implementing regulation at 45 CFR part 80** - The law that protects individuals from discrimination based on their race, color, or national origin under any program or activity that receives Federal financial assistance.
- **Limited English Proficiency - (LEP)** Those customers who cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with program service providers.
- **Vital documents** - A document, paper or electronic, that contains information that is critical for accessing the provider/agency services and/or benefits; letters or notices that require a response from the customer; and documents that inform customers of free language assistance.
- **Safe Harbor** - The threshold that permits programs to decide when a written translation is required in order to comply with Title VI of the Civil Rights Act of 1964. The following are the thresholds:
  - Written translation of agency vital documents will be provided for each eligible language group that 5% or 1,000 individuals, whichever is less, will be provided for the populations of persons eligible to be served or encountered by our programs.
  - If there are fewer than 50 persons in a language group, the recipient does not translate vital written materials, but provides written notice in the primary language of the LEP group of their right to oral interpretation of those written materials, free of cost.
- **Major LEP Language Groups** - The populations of persons with Limited English Proficiency (LEP) in Wisconsin that represent 5% or 1,000 individuals in the area. For Wisconsin, the **Statewide Major LEP Language Groups** are Spanish and Hmong.
- **Qualified Interpreters** - Qualified interpreters have: demonstrated proficiency in English and the second language; demonstrated knowledge in both languages of relevant specialized terms or concepts; and documentation of completion of training on the skills and ethics of interpretation, and awareness of relevant cultural issues.



Written translation of agency vital documents will be provided for each eligible language group that constitutes 5% or 1,000 individuals, whichever is less, for the populations of persons eligible to be served encountered by our programs.

If there are fewer than 50 persons in a language group, the recipient does not translate vital written materials, but provides written notice in the primary language of the LEP group of their right to oral interpretation of those written materials, free of cost.

The provision of written translation of agency documents, including vital documents, will be in accordance with an annual agency plan that addresses costs and priorities.

- **ORAL INTERPRETATION**

Oral interpreters will be offered to customers in a timely manner free of charge. Services offered to LEP customers will be documented in appropriate records.

- **ACQUIRING TRANSLATION AND INTERPRETATION SERVICES**

Resources and procedures for obtaining oral interpretation and written translation will be made available to program staff.

The Wisconsin Department of Workforce secured services as follow. Information necessary for piggybacking on those services is attached.

**Oral Communication**

Contract Information for Telephone Conference-Call Foreign-Language Oral Interpretation Services  
<http://vendornet.state.wi.us/vendornet/aspbin/bulshownigp.asp?BulletinID=1354>

**Written Communication**

Contract Information for Written Translations; Translation Services for written documents.  
<http://vendornet.state.wi.us/vendornet/aspbin/bulshownigp.asp?BulletinID=1476>

- **COMPETENCY OF INTERPRETERS AND TRANSLATORS**

Qualified interpreters and translators will be utilized to provide services. Interpreters and translators will be screened for appropriate training and cultural sensitivity, and will be required to comply with agency confidentiality policies and Code of Ethics when interpreting or translating.

- **OTHER COMMUNICATION METHODS**

Interactive Voice Response Systems, voicemail, web pages, posters, videos, and media used will be made accessible to LEP populations in accordance with the agency's plan to translate vital documents and other materials.

Electronic systems and computer-generated notices will be made accessible to LEP populations in accordance with the agency's plan to translate vital documents and other materials.

## **TRAINING**

Training, including refresher training, will be made available to agency staff and funding recipients.

## **COMMUNITY OUTREACH**

Community outreach to the major LEP groups served by the agency's programs will be conducted to ensure LEP customers have equal access to services.

## **NOTICE OF LANGUAGE ACCESS RIGHTS**

- ✓ **You have the right to a qualified interpreter service at no cost to you.**
- ✓ **You have the right not to be required to rely on minor children, other relatives, or friends as interpreters.**
- ✓ **You have the right to file a grievance about the language access services provided.**

It is the policy of Legal Action of Wisconsin, Inc. to provide language access to populations of persons with Limited English Proficiency (LEP) who are eligible to be served or likely to be directly affected by our programs. Such services will be focused on providing meaningful access to our programs, services, and/or benefits. Our Language Access Coordinator is Gary R. Hassel. Please contact him at (920) 432-4645 if you have any questions or would like to file a grievance.

- **Intérpretes Competentes** – Intérpretes competentes serán capaces de proveer lo siguiente: demostrar dominio del inglés y del segundo idioma; demostrar conocimiento en ambos idiomas de términos y conceptos especializados relevantes; y documentación de haber completado entrenamiento en destrezas y ética de interpretación.
- **Interactive Voice Response** – (IVR System) Un sistema automatizado que permite a las personas que llaman obtener y proveer información a través del teléfono, en inglés y otros idiomas.

### **COORDINADOR PARA CAPACIDAD LIMITADA DE INGLÉS**

Un Coordinador para capacidad limitada de inglés (LEPC) será nombrado a nivel de gerencia para supervisar los requisitos y procesos de LEP, tal como se requiere de agencias que reciben ayuda económica Federal. Planificación y servicios de LEP son provistos en coordinación con provisión de igualdad de oportunidad en servicios y empleo.

El Coordinado de LEP (LEPC) a nivel de gerencia de la agencia es:

Nombre	Número De Teléfono
Ms. Mary Triggiano	(414) 278-7722

La persona responsable si el Coordinador para capacidad limitada de inglés LEPC no está disponible es

Nombre	Número De Teléfono
Mr. Michael J. Maher	(414) 278-7777

### **EVALUACIÓN Y PLANIFICACIÓN**

La población LEP se evaluará cada año y se identificarán los principales grupos lingüísticos a servir. Luego de la evaluación se desarrollará un plan y relacionados procesos y requisitos para satisfacer las necesidades de la población elegible para ser atendida o que probablemente serán afectadas por nuestros programas y asegurar cumplimiento con la política LEP de la agencia.

### **CONTROL VIGILANTE**

Supervisión continua del plan se conducirá de acuerdo con los procesos de control de la agencia.

### **NOTIFICACIÓN ESCRITA DE LOS DERECHOS A ACCESO LINGÜÍSTICO**

Declaraciones de acceso lingüístico informarán a los clientes LEP sobre sus derechos, como sigue:

- Sus derechos a servicios de intérprete competente y libre de costo.
- Sus derechos a que no se les requiera depender de niños menores de edad, otros familiares, o amigos para que les sirvan de intérpretes.
- Sus derechos a presentar una queja sobre los servicios de acceso lingüístico que se les proveyó.

Los derechos a acceso lingüístico serán distribuidos por escrito en los idiomas principales de los grupos LEP a través de los siguientes métodos:

- Colocando carteles/pósters en entradas y salas de esperas
- Orientaciones a los clientes
- Declaraciones en las notificaciones de apelación
- Declaraciones folletos, promoción en la comunidad, información de reclutamiento y otros materiales que regularmente se distribuyen al público

### **ANUNCIO DE LA POLÍTICA DE IGUALDAD DE OPORTUNIDAD Y PROCEDIMIENTO DE PRESENTAR QUEJAS POR DISCRIMINACIÓN**

## **CAPACITACIÓN**

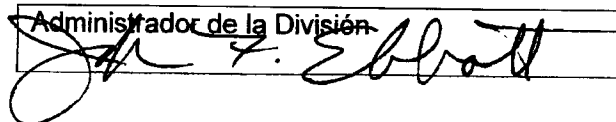
Capacitación/entrenamiento, incluyendo re-capacitación, estará disponible a empleados de la agencia que recibe fondos.

## **PROMOCIÓN EN LA COMUNIDAD**

Se conducirán promociones para diseminar información a la comunidad de los grupos principales de LEP que la agencia sirve a través de programas para así asegurar que los clientes LEP tengan igualdad de acceso a servicios.

## **AUTORIDAD**

Orden Ejecutiva 13166  
Título VI del Acta de Derechos Civiles

Administrador de la División 	Fecha 2/10/2004
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## ATTACHMENT 4

### TSAB CAI TSWJ KEV TSIS PAUB LUS ASKIV ZOO (Limited English Proficiency Policy)

#### HAIS TXOG TSAB CAI (Policy Statement)

Lub chaw ua haujlwm (chaw ua haujlwm npe) Legal Action of Wisconsin, Inc.

Cog lus yuav muab txhuam yam kev pab kom sibtxig sibluag (equal opportunity) thiab ua haujlwm kom tau raws li txoj cai vajhuam sibluag (civil rights laws), nrog rau Title VI los ntawm 1964 Civil Rights Act uas tau tswj kom txhob muaj kev ua tsis ncaincees (non-discrimination) rau ib haivneeg twg (national origin). Kev pab sibtxig sibluag (Equal opportunity) yog xam tag nrho sab nqaij tawv thiab kev mus thov kev pab rau cov neeg uas xiam oo khab thiab mus thov kev pab rau cov neeg uas tsis paub lus Askiv zoo (Limited English Proficiency (LEP)). Kev mus thov kev pab rau cov neeg xiam oo khab yog tswj los ntawm (Americans with Disabilities Act xyoo 1990 thiab the Rehabilitation Act xyoo 1973 raws li twb raug pom zoo los lawm, Nqe 504.

Nws yog lub chaw ua haujlwm no ib txoj kevcai uas yuav tsum muab kev pab txhais lus rau cov peixeem uas tsis paub lus zoo (Limited English Proficiency (LEP) uas lawv muaj feem taus txais kev pabcuam lossis qhia kom lawv mus thov tau peb tej kev pab. Tej kev pab yuav raug saib xyuas kom zoo kom qhia tau lub tseemntsiab rau kev mus thov peb tej kev pab (programs), kev pabcuam (services) thiab /lossis tej kev pab (benefits.)

#### TXHAIS COV NTSIABLUS (Definitions)

Cov lus hauv qab no yog txhais cov ntsiab lus ntawm tsab cai tswjfw (policy) no:

- **Title VI los ntawm Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.** thiab nws tsab kevcai tswj ntawm **45 CFR tshooj 80** – Yog tsab cai tivthaiv tibneeg los ntawm kev ua tsis ncaincees (discrimination) rau lwm haivneeg txawv (race), nqaij tawv txawv (color), lossis yog neeg txawv tebchaws (national origin) thaum lawv mus thov tsoomfwv tej nyiajtxiag pab.
- **Tsis Paub Lus Askiv Zoo** (Limited English Proficiency (LEP)) – Yog cov neeg uas tsis paub lus, nyeem tsis tau ntawv, sau tsis tau ntawv lossis tsis totaub lus Askiv zoo uas yuav coj tau lawv yuav mus thov kev pab los ntawm tej chaw ua haujlwm.
- **Ntaub Ntawv Tseemceeb** (Vital documents) – Yog tsab ntawv, daim ntawv lossis tej ntaub ntawv uas sau tej lus nyuab, ua rau kev mus ntsib cov neeg ua haujlwm/chaw ua haujlwm thiab mus thov kev pab tsis yoojyim, lossis tej ntaub ntawv uas yuav tsum tau ua kom raws kevcai. Tej ntaub ntawv tseemceeb (Vital documents) yog xam tag nrho, tiamsis tsis tag rau: cov ntaub ntawv thov/rau npe (applications/registrations); cov ntaub ntawv tsocai (consent forms); cov ntaub ntawv ceebtoom txog kev pomzoo tau txais kev pab (approval), tsis pomzoo tau txais kev pab (denial), txo kev pab (reduction), lossis txiav kev pab (termination); tej ntaub ntawv uas yuav tsum tau teb rov qab; thiab tej ntaub ntawv uas xa mus qhia rau cov peixeem tau txais kev pab txog kev pab txhais lus.
- **Safe Harbor** – Qhov teev tseg ua kev txiavtxim tias thaum twg tej kev pab (programs) thiaj tsimnyog muab lawv tej ntaub ntawv txhais sau ua lwm hom lus kom raws li txoj kevcai Title VI los ntawm Civil Rights Act of 1964 tau teem tseg. Hauv qab no yog cov ntsiab lus teev tseg pab rau kev txiavtxim txog kev txhais lus txhais ntaub ntawv:

DWSD-13046-E-H (R. 11/2003)

- Raws li txoj cai teev tseg hauv LEP, thaum cov peixeem ntawm tej hom neeg uas hais lwm hom lus muaj coob txog 5% lossis 1,000 leej, nyob ntawm seb qhov twg yog qhov tsawg yuav qhov ntawd, yuav tsum tau muab tsoom fwv tej ntaub ntawv tseemceeb (vital documents) txhais sau hais ua cov

- Lawv muaj cai tsis pub thiab tsis tso siab rau lawv tej menyuam tsis tau nto noobnyoog, tej txheeb ze, lossis phoojywg uas tus txhaislus rau lawv.
- Lawv muaj cai sau ntawv foob txog kev txaislus uas tau muab pab rau lawv.

Tsab ntawv ceebtroom txog kev muaj cai tau txais kev pab txhaislus yuav tsum muab tseb tawm rau cov pejxeem uas tsis paub lus raws li nram qab no:

- Muab lo rau ntawm chav tsev (lobbies) thiab chav tsev qhua zaum tos
- Tseb tawm rau lub sijhawm muab kev cobqhia rau cov pejxeem (Customer orientations)
- Sau rau hauv tsab ntawv ceebtroom txog kev thov kev sib hais cai (appeal notices)
- Sau rau hauv cov ntaub ntawv (brochures), cov phauv ntawv (booklets), ntaub ntawv tseb tawm rau pejxeem (outreach), ntaub ntawv nrhiav pejxeem (recruitment information thiab lwm yam ntaub ntawv uas yuav muab tseb tawm rau pejxeem huabhwam.

### **DAIM NTAUV QHIAV TXOG TXOJ CAI VAJHUAM SIB LUAG (EQUAL OPPORTUNITY POLICY) KEV SAU NTAUV FOOB KEV UA TSIS NCAJNCEES** (Discrimination Complaint Postings)

Daim ntawv qhiav txog txoj cai Vajhuam Sib Luag (Equal Opportunity Policy) thiab Sau Ntawv Foob Kev Ua Tsis Ncajnrees (Discrimination Complaint) hais txog txhua yam kev pab yuav tsum muab txhais ua lwm hom lus uas tsimnyog yuav tsum tau txais thiab muab lo rau ntawm tej qhov chaw neeg pom lossis tej qhov chaw ntsib pejxeem, thajtsam ntawm tus neeg ua haujlwm tosghua nyob (reception) lossis chav qhua zaum tos.

### **KEV TXHAIS LUS THIAB TXHAIS NTAUB NTAUV** (Interpretation And Translation)

#### **• TXHAIS NTAUB NTAUV**

- Raws li txoj cai teev tseg hauv LEP, thaum cov pejxeem ntawm tej hom neeg uas hais lwm hom lus muaj coob txog 5% lossis 1,000 leej, nyob ntawm seb qhov twg yog qhov tsawg yuav qhov ntawd, yuav tsum tau muab tsoom fwm tej ntaub ntawv tseemceeb (vital documents) txhais sau hais ua cov pejxeem ntawd hom lus raws li lawv muaj feem tau txais lossis tej kev pab pab muaj uas ntxim li tsimnyog lawv yuav tau.
- Yog tias cov pejxeem ntawm tej hom lus ntawd tsawg dua li 50 leej, tej tsoom fwm tsi tas yuav muab lawv tej ntaub ntawv tseemceeb (vital documents) txhais sau ua hom lus ntawd, tabsis yuav tsum tau sau txhais daim ntawv ceebtroom (notice) los ua cov pejxeem ntawd hom lus li txoj cai hauv LEP mus qhia pub rau hom neeg ntawd paub tias lawv muaj cai tau txais kev pab kom muaj tus txhais lus los txhais nyeem cov ntaub ntawv ntawd ua lawv hom lus pub dawb rua lawv, ua tsi yuav ngi.

Kev uas tej tsoom fwm yuav muaj peevxwm txhais sau kom tau ntau yam ntaub ntawv, nrog rau tej ntaub ntawv tseemceeb hauv tibsi kom raws li txoj cai yog cov tsoom fwm yuav tsum hnaij xyoo muab tej nujnqi uas yuav siv txhais lus no sau kom tseg rau hauv lawv tej homphiaj nyiaj txiag uas lawv npaj yuav siv.

#### **• TXHAIS LUS**

Yuav tsum muab kev pab txhais lus dawb yam tsis raug nqi dab tsi rau cov pejxeem lossis tej yim neeg uas tau txais kev pab. Tej kev pab uas tau muab pab rau cov pejxeem uas tsis paub lus (LEP customers) yuav tau muab sau tseg rau hauv ntaub ntawv cia.

#### **• NRHIAV NEEG PAB TXHAIS LUS THIAB TXHAIS NTAUB NTAUV**

Cov cai tswjfwam kev uas yuav nrhiav neeg pab txhais lus thiab txhais tej ntaub ntawv yuav tsum tau npaj kom muaj tseg rau cov neeg uas ua haujlwm hauv tej kev pab cuam tau siv.

## **QHIA TXOG KEVCAI NPAJ KOM MUAJ KEV HAIS LUS**

- ✓ **Koj muaj cai tseev kom tau ib  
tug neeg paub txhais lus zoo los  
txhais lus rau koj yam tsis raug  
theem nyiaj ntiav.**
- ✓ **Koj muaj cai tsis pub kom luag  
quab yuam koj cia menyuam yaus,  
kwvtij neejtsa, los yog phoojywg  
los txhais lus rau koj.**
- ✓ **Koj muaj cai hais txog koj  
txojkev tsis txaus siab rau txojkev  
txhais lus uas npaj muaj rau koj.**

Txojcai ntawm Legal Action of Wisconsin, Inc. yuam kom npaj muaj kev txhais lus rau cov neeg hauv zej zog tsis paub hais lus Amerikas uas muaj feem tau kev pab los yog muaj feem yuav hloov tus kheej los ntawm peb tej kev pab. Tej kev pab ntawd yuav tsum ua kom yoojyim thiab zoo rau cov tibneeg tuaj nrhiav kev pab los ntawm peb tej kev pab cuam. Peb tus Saib Xyuas txog txojkev npaj kom muaj kev txhais lus yog Gary R. Hassel. Thov

**CLIENT GRIEVANCE PROCEDURE  
LEGAL ACTION OF WISCONSIN, INC.**

1. As a client of Legal Action of Wisconsin, Inc. (LAW), if you have a complaint about the quality of legal assistance which you have received, or about the denial of such legal assistance, including language barriers, you can make that complaint orally or in writing to the Managing Attorney of the LAW office at which you sought assistance.
2. After you make a complaint, the appropriate Managing Attorney, or someone designated by her, will meet with you in person or by telephone. After meeting with you, the LAW staff person will advise you in writing of the resolution of your complaint.
3. If you are not satisfied with that resolution of your complaint, you can file a grievance with the LAW Client Grievance Committee assigned to that office. You can file this grievance with the Managing Attorney.
4. If you file a grievance with the LAW Client Grievance Committee, you will have a chance to appear before that Committee, either by yourself or with a representative. When you appear, you may make either an oral or a written statement, or both, concerning your grievance. The Grievance Committee will meet with you within a reasonable time. Your meeting with the Client Grievance Committee will be considered an informal hearing.
5. At that informal hearing, LAW's attorney or non-attorney staff who are the subject of your grievance may also be present. At the end of that informal hearing, you will be given the opportunity to make a statement, which will be transcribed, for inclusion in your complaint file.
6. Within a reasonable time of that informal hearing, you will be notified in writing of the results of that hearing and any recommendations of the LAW Client Grievance Committee.



## ATTACHMENT 5

### HOW TO FILE AN EMPLOYMENT OR SERVICE DELIVERY DISCRIMINATION COMPLAINT

If you feel that you have been treated differently because of your age, race, religion, color, sex, national origin or ancestry, disability or association with a person with a disability, arrest or conviction record, sexual orientation, marital status or pregnancy, political belief or affiliation, a military participation, or use or non use of lawful products off the employers or service providers premises during working hours, you may file a complaint. If you were wrongfully denied services, or if the treatment you received was separate or different from others, or if the program was not accessible to you, it may be discrimination.

**IMPORTANT:** If your application for service was not taken or your were told you were not eligible for a particular program BUT you feel you are eligible, ask the provider for a pamphlet which explains how to request a local agency appeal process or State administrative hearing review. Your right to this review or hearing does not need to be connected to a discrimination complaint.

You may file an informal discrimination complaint with your employer or service provider, or you may file a formal discrimination complaint with a state or federal agency. No one may threaten or harass you for making a complaint. No one may threaten or harass your witnesses because they are willing to say that they saw, heard or experienced.

All formal complaints must be filed within 180 days of the event or treatment you feel was discrimination. However, you should file the complaint as soon as possible after the action took place. IF you file an informal complaint and you are not satisfied with the resolution, you can still file a formal complaint as long as you do it within filing time frame. Do not wait until after the filing deadline to get an answer to the informal complaint if you plan to make a formal complaint.

To file an informal discrimination complaint with your provider or employer, request a discrimination complaint form by calling the Equal Opportunity Coordinator at (414) 278-7777 or TDD (414) 278-1270. Send the complete form back to your provider's Equal Opportunity Coordinator. His or her name should be on this form.

If you wish to file a formal discrimination complaint, you may send the completed complaint form directly to the appropriate state or federal agency listed on the following pages. Include a letter stating that you are making a formal complaint to their agency as the funding source. Staff of the state or federal agency will provide the results to you within 90 days.

**File Formal Discrimination complaints about these services with the agencies listed below.**

PROGRAM	AGENCY
Wisconsin Works (W-2), Child Support, Emergency Assistance, Food Stamp Employment and Training, Learnfare, Day Care, Community Service Jobs, (W-2) Transitions, Job Access Loans, Refugee Services.	Wisconsin Dept. of Workforce Development Division of Workforce Solutions ATTN: Equal Opportunity Officer P.O. Box 7972 Madison, WI 53707-7972 V/TDD: 608-266-6889
Unsubsidized and Trial Jobs Complaints. Any employment condition as an employee of DWD funding.	Equal Rights Office P.O. Box 8928 Madison, WI 53708 Telephone: 608-266-6860 TDD-Hearing Impaired: 608-264-8752

## SERVICE DELIVERY OR EMPLOYMENT DISCRIMINATION COMPLAINT

**If you need help completing this form please contact:**

Equal Opportunity Coordinator  
Michael J. Maher

Phone (Voice)  
(414) 278-7777

Phone (TDD)  
(414) 278-1270

Name of Complainant

Phone  
( ) -

Address (number, street, city, state, zip code)

**Basic for Service or Employment Discrimination Complaint** (such as: age, race, religion, color, sex, national origin or ancestry, disability or association with a person with a disability, arrest or conviction record, sexual orientation, marital status or pregnancy, political belief or affiliation, military participation, or use or non use of lawful products off the employers or service providers premises during working hours).

Name of the Agency and/or Employee or Employer Against Whom the Complaint is Filed.

Describe the action or treatment which you think was discriminatory. Include information about who, what, when, where, how, why, and the names, addresses and phone numbers of any witnesses, if you know them. Please be specific about the date of the last incident. You may write this on another sheet of paper if you need more room. In the space below, please say how many pages are attached if you need to add pages.

Description of the Relief or Satisfaction you Want:

Signature of Complainant or Complainant Representative

Date Signed

## PASOS A SEGUIR POR LOS CLIENTES PARA PRESENTAR QUEJAS

### LEGAL ACTION OF WISCONSIN, INC.

1. Por ser cliente de Legal Action of Wisconsin, Inc. (LAW), si usted tiene alguna queja o querrela acerca de la asistencia legal recibida o acerca de que se le haya negado esa asistencia incluyendo por barreras linguisticas, usted puede presentar una queja ya sea oral o por escrito. Esta debe de ser dirigida a la abogada encargada de la oficina de LAW en la cual usted solicitó asistencia.
2. Después de presentar la queja, la abogada encargada de esa oficina o alguien designado por ella, tendrá una reunión con usted ya sea en persona o por teléfono. Después de esa reunión, personal de la oficina de LAW le informará por escrito de los resultados de su queja.
3. Si usted no está de acuerdo con el resultado de su queja, usted puede presentar una queja con el comite encargado de quejas para clientes encargado de esa oficina. Usted puede introducir esa queja con la abogada encargada de esa oficina.
4. Si usted procede a presentar su queja con el comité encargado de quejas para clientes, usted tendrá la oportunidad aparecer ante ese comité ya sea solo/a o con alguien que le represente. Cuando aparezca, usted puede hacer los argumentos de su queja ya sea por medios orales, por escrito o de ambas maneras. Este comité de quejas se reunirá con usted entre un tiempo razonable. Esta reunión con el comité se considerará una audiencia informal.
5. En esta audiencia informal, los abogados o personal de la oficina LAW que son objeto de su queja o querrela pueden estar presente. Al final de esa audiencia informal a usted se le dará la oportunidad de dar sus declaraciones las cuales serán transcritas para incluirlas como parte del archivo de su queja.
6. Luego de un tiempo razonable del día de su audiencia informal, a usted se le notificará de los resultados de la audiencia y de las recomendaciones del comité de quejas para clientes de LAW.

Quejas de trabajos no subsidiados y de prueba. (unsubsidized and trial jobs complaints. Any employment condition as an employee of dwd funding.)	Equal Rights Office P.O. Box 8928 Madison, WI 53708 Telephone: 608-266-6860 TDD-Hearing Impaired: 608-264-8752
	Equal Rights Office 819 North Sixth Street, Room 255 Milwaukee, WI 53203 Telephone: 414-227-4384, TDD: 414-227-4081
Proveedores de servicios de asistencia médica. (Medical Assistance Service, Women Infants and Children, Food Stamps, BadgerCare, Senior Care, Child Placement Services, Medicaid, Community Aid, and other programs administered by the WI Dept. of Health and Family Services.)	Wisconsin Dept. of Health and Family Services Division of Management and Technology Office of Civil Rights Compliance 1 W. Wilson, Room 561 P.O. Box 7850 Madison, WI 536707 Voice: 608-266-9372, TDD: 608-266-2555
<b>Ud. también tiene el derecho de presentar una queja formal a una oficina federal.</b>	
Queja formal acerca de cualquiera de los servicios arriba mencionados, excepto cupones alimentarios (food stamps).	U.S. Dept. of Health and Human Services Office for Civil Rights Region V, 233 N. Michigan Ave. Chicago, IL 60601 Telephone: 312-886-2359, TDD: 315-353-5693
Queja formal acerca de cualquier programa.	U.S. Dept of Justice Civil Rights Division 10 <sup>th</sup> and Pennsylvania Ave., NW Washington, D.C. 20530 Telephone: 202-514-0301, TDD: 800-800-3302
Queja formal de cupones alimentarios (Food Stamps).	Administrator, Food and Nutrition Service 3101 Park Center Drive Alexandria, VA 22302  Food and Consumer Services Civil Rights Program U.S. Department of Agriculture 77 Jackson Boulevard, 20 <sup>th</sup> Floor Chicago, IL 60604 Voice: 312-353-1457  U.S. Equal Employment Opportunity Commission 310 W. Wisconsin Ave., Suite 800 Milwaukee, WI 53203 Telephone: 414-297-1111, TDD: 414-297-1115  The Office of Federal Contract Compliance U.S. Department of Labor 230 South Dearborn Street Chicago, IL 60603 Telephone: 312-353-2158, TDD: 312-353-2158

### INFORMAL COMPLAINT

La información debajo de la doble línea en la próxima página la completará la persona de la oficina que reciba su queja, la investigue y le responda a ud.

Date Received	Received By	Title
Agency		
Actions and Individual(s) to be Investigated		
Findings (Must be completed within 30 days)		
Action Taken		
Further Action Required?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, what action is recommended?

El Departamento de Justicia de los E.U.A., División de Derechos Civiles (U.S. Department of Justice, Civil Rights Division), 10<sup>th</sup> and Pennsylvania Avenue NW, Washington, D.C. 20530, tiene un teléfono de acceso público para ADA (Ley de Estadounidenses con Discapacidades ) con información grabada que incluye números de teléfono adicionales para empleos, servicios, transporte, acomodo público y facilidades comerciales, y transmisión de telecomunicaciones. Las horas de acceso al público de la ADA son 12:00-4:00 P.M., hora central solamente: (202) 614-0301 o TDD (800) 800-3302.

SPANISH DISCRIMINATION COMPLAINT FORMS  
DWSD-13005-E-S (R. 11/2003)

KEV PAB	CHAW UA HAUJLWM
<p>Wisconsin Works (W-2), Nyiaj yug menyuam (Child Support), Emergency Assistance, Nyiaj muasnoj thiab Nyiaj muasnoj haujlwm (Food Stamp Employment) thiab Kawm haujlwm (Training), Kawm ntawv (Learnfare), Zov menyuam, Ua haujlwm rau hauv nruab zejzog (Community Service Jobs), (W-2) transitions, Nyiaj txais ua haujlwm (Job Access Loans), Ntawv khomob (Medical Assistance Eligibility), Kev pab rau cov neeg thojnam tawgrog (Refugee Services.)</p>	<p>Wisconsin Dept. of Workforce Development Division of Workforce Solutions ATTN: Equal Opportunity Officer P.O. Box 7935 Madison, WI 53707-7935 V/TDD: 608-266-6889</p>
<p>Ua ntawv foob txog kev tsis tau txais kev pab thiab kev mus sim ua haujlwm (Unsubsidized and Trial Jobs Complaints.)</p>	<p>Equal Rights Office 201 E Washington Ave, Room 407 P.O. Box 8928 Madison, WI 53708 Telephone: 608-266-6860 TDD-Hearing Impaired: 608-264-8752</p> <p>Equal Rights Office 819 North Sixth Street, Room 255 Milwaukee, WI 53203 Telephone: 414-227-4384 TDD-Hearing Impaired: 414-227-4081</p>
<p>Cov chaw khomob rau Medical Assistance Service thiab lwm qhov chaw ua haujlwm DHFS programs.</p>	<p>Wisconsin Dept. of Health and Family Services Division of Management and Technology Office of Civil Rights Compliance 1 W. Wilson, Room 561 PO Box 7850 Madison, WI 53707 Voice 608-266-9372 TDD 608-266-2555</p>
<p><b>Koj tseem muaj cai ua ntawv foob (formal complaint) xa mus rau tseemfwv qibsiab (federal agency) thiab.</b></p>	
<p>Ua ntawv foob txog kev ua tsis ncaincees (Formal Discrimination Complaint) txog tej yam kev pab xws li hais los saumtoj no, tsis xam nyiaj muasnoj (except food stamps.)</p>	<p>U.S. Dept. of Health and Human Services Office for Civil Rights Region V, 233 N. Michigan Ave Chicago, IL 60601 Telephone: 312-886-2359 TDD: 315-353-5693</p>
<p>Ua ntawv foob txog tej kev pab tsis ncaincees (Formal Discrimination Complaint) tsis hais yam twg.</p>	<p>U.S. Dept. of Justice Civil Rights Division 10th and Pennsylvania Ave. NW Washington, DC 20530 Telephone: 202-514-0301 or TDD: 800-800-3302</p>

**DAIM NTAUV FOOB TXOG KEV TSIS TAU TXAIS KEV PAB  
LOSSIS HAUJLWM NCAJNCEES (DISCRIMINATION COMPLAINT)**

Yog koj xav tau kev pab ua daim ntawv no hu rau:

Tus neeg ua haujlwm Equal Opportunity Coordinator Mr. Michael J. Maher	Xovtooj (Hais lus) (414) 278-7777	Xovtooj (TDD) (414) 278-1270
---------------------------------------------------------------------------	--------------------------------------	---------------------------------

Tus Neeg Ua Ntawv Foob Npe	Nabnpawb Xovtooj (   )   -
Chawnyob (nabnpawb, kev, nroog, xeev, zip code)	

**Qee Yam Kev Ua Tsis Ncajnnees Rau Kev Pab thiab Haujlwm** (yog xws li: noobnyoog, yog lwm hom neeg txawv (race), dabqhuas txawv (religion), nqaijtawv txawv (color), yog pojniam/txivneej (sex), yog neeg txawv tebchaws (national origin), lossis pojyawm txwvtxoob yog neeg txawv tebchaws (ancestry), yog neeg xiam oo khab lossis muaj feemcuam nrog ib tug neeg xiam oo khab, raug txhom lossis muaj plaubntug, kev dajdeev txawv (sexual orientation), muaj/txis muaj pojniam/txiv (marital status) lossis cev xeebtub, ntseeg lossis koom nrog ib phav kasmuas twg (political belief or affiliation), yog neeg ua tubrog, txwv txis pub siv tej khoom uas tso cai siv tau nyob rau ntawm qhov chaw ua haujlwm lossis chaw thov kev pab lub sijhawm ua haujlwm.

Npe Qhov Chaw Ua Haujlwm (Agency) lossis Tus Neeg Ua Haujlwm (Employee) lossis Qhov Chaw Ua Haujlwm ( Employer) Uas Ua Ntawv Foob

Piav seb qhov teebmeem lossis qhov uas koj xav hais tias lawv ua tsis ncajnnees rau koj yog dab tsi. Sau tag nrho seb yog leejtwg, dab tsis, thaum twg, qhov twg, ua li cas, vim li cas, nrog rau cov povthawj npe, chawnyob thiab xovtooj, yog koj paub. Thov qhia lub vasthib thaum cov teebmeem tshwmsim kom meej. Muab dua ib daim ntawv los sau ntxiv yog hais tias chaw tsis txaus sau. Thov sau rau cov kab hauv qab no seb koj txuas pestsawg daim ntawv ntxiv.

Nplooj ntawv txuas ntxiv tom ntej no txij kab dub dub rov hauv yog cia rau tus neeg ua haujlwm uas txais koj daim ntawv foob mam xyuas thiab teb rov qab tuaj rau koj.



## ATTACHMENT 6

### DEPARTMENT OF WORKFORCE DEVELOPMENT and DEPARTMENT OF HEALTH AND FAMILY SERVICES

#### LETTER OF ASSURANCE for CIVIL RIGHTS COMPLIANCE

As a condition of funding under this contract, (Recipient) Legal Action of Wisconsin, Inc.  
provides the following assurances:

- A. **Service Delivery:** Services will be provided without discrimination in compliance with Title VI of the Civil Rights Act of 1964, Section 503 of the Rehabilitation Act of 1973, Title VI and XVI of the Public Health Service Act, the Age Discrimination Act of 1975, the Omnibus Budget Reconciliation Act of 1981, Titles II, III and IV of the Americans with Disabilities Act (ADA) of 1990, and if applicable, the Food Stamps Act

No otherwise qualified person, shall be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination in any manner on the basis of age, race, color, disability, association with a person with a disability, gender, and national origin. If applicable, no qualified person will be denied Food Stamp participation based on all of the above, as well as for religious belief and political affiliation.

The Recipient will:

1. Upon request, provide a nationally certified or Wisconsin Interpreting and Transliterating Assessment (WITA)-verified sign language interpreter to assist deaf and hard of hearing applicants. Other options for effective communication (e.g., using FM radio stations, TTY, or other appropriate technology) to deaf and hard of hearing clients who do not use American Sign Language (ASL) must be provided;
  2. Provide an oral interpreter for an applicant/participant with limited English proficiency (LEP) or the purpose of participating meaningfully with the organization's programs and services;
  3. Provide LEP applicants/participants with written notice of their right to receive oral interpretation in their primary language free of charge;
  4. Provide translation of vital documents for each eligible LEP group that constitutes at least 5% or 1,000 individuals, whichever is less, for the population eligible to be served or likely to be encountered in the recipient's service area. Vital documents are paper or electronic documents that contain information that is critical for accessing the provider/agency services and/or benefits, or is required by law. They include, but are not limited to, applications/registrations, consent forms, letters containing information regarding eligibility or participation criteria, and notices pertaining to the approval, reduction, denial or termination of services or benefits, that require a response from beneficiaries, and/or that advise of free language access.
  5. Contact DHFS Affirmative Action and Civil Rights Office for technical assistance when an LEP participant requests for a translation of a written document not previously translated.  
([cruze@dhfs.state.wi.us](mailto:cruze@dhfs.state.wi.us))
  6. Establish an appeal or complaint process that shall be posted in conspicuous places available to applicants/clients of services.
- B. **Employment Conditions:** Employment discrimination is prohibited by Title VII of the Civil Rights Act of 1964, ADA Title I, Rehabilitation Act s. 504, Age Discrimination in Employment Act, of 1976, Ch. 111.31 to 11.395 (Wis. Fair Employment Act) and other laws governing discrimination in employment.

Please submit Attachment 4 with the completed **Cover Page of the CRC Plan** to:

<b>DHFS</b>	<b>DWD</b>
David Duran Civil Rights Compliance Officer DHFS AA/CRC Office One West Wilson Street, Room 561 P.O. Box 7850 Madison, WI 53707-7850  608-266-9372 Voice 608-267-2147 Fax 608-266-2555 TTY	Civil Rights Unit Division of Workforce Solutions Bureau of Division-Wide Services Human Resources Section 201 E. Washington Ave P.O. Box 7972 Madison, WI 53707  William Franks 608-266-6889 Earnestine Moss 608-266-5335 Elayne Moore 608-264-9820

DWSD-13004-E (R. 11/2003)

**Executive Director's Report to the Personnel Committee  
of the Legal Action Board of Directors  
on the Legal Action Equal Opportunity/Affirmative  
Action Statement**

**December 2003**

The Equal Opportunity/Affirmative Action Statement of Legal Action of Wisconsin, Inc. is set forth in the Board Manual at Sec. IV-C and in the Legal Action Staff Manual at Page VI-B-1. That statement provides that the Executive Director shall provide, by December 31 of each year, an evaluation of the equal opportunity policies to the Personnel Committee, including a comment on its operation and any recommendations. The evaluation of the equal opportunity policies also encompasses the Legal Action Sexual Harassment Policy set forth in the Legal Action Staff Manual at Page VI-H-1.

1. Evaluation

Because of the potential impacts of various U.S. Supreme Court decisions on Legal Action's Equal Opportunity/Affirmative Action Statement, during November, 2001 the law firm of Michael, Best and Friedrich, Legal Action's employment law counsel, completed a thorough review of Legal Action's Equal Opportunity/Affirmative Action Statement including the Sexual Harassment Policy. Based upon the results of their review, the statement was amended in December, 2001 to highlight the firm's extensive diversity and outreach efforts while modifying any procedures which could be construed as providing a preference or priority. Beyond the changes that were implemented in 2001, the overall purpose, responsibilities and policies set forth therein continue to be appropriate for this law firm, and the provisions regarding recruitment, job qualifications, job testing, screening and evaluation of applicants, benefits and compensation, promotion and the complaint procedure are all rationally designed to achieve the goals of that policy.

2. Operation

In general, Legal Action of Wisconsin, Inc. has aggressively and creatively sought and employed qualified persons, has provided equal opportunities in all aspects of employment, and has administered all personnel activities in a manner which does not discriminate against any person because of race, color, creed, ancestry, sex, age, national origin, disability, marital status, sexual orientation or any other consideration prohibited by law. All hiring, placement and promotion of applicants and employees has been made on the basis of individual ability and performance, and on the basis of the staffing needs of the program consistent with the commitment to equal opportunity that is set forth in the Equal Opportunity/Affirmative Action Statement. All hiring, placement and promotional activities have been monitored by the firm to assure that full consideration has been given to all qualified minority and women applicants and employees.

Two examples are the National Association for Public Interest Law Directory and the National Association for Law Placement Directory.

5. ADA Compliance

In compliance with Title I of the Americans with Disabilities Act (ADA), Legal Action has reviewed and rewritten job descriptions to more clearly define essential job functions and marginal job functions. Legal Action has also reviewed all hiring procedures for potential barriers and posted the requisite notices regarding employment. Information has been distributed to staff members regarding resources available to assist disabled persons whom they advise.

Legal Action has also completed surveys of all facilities for access by disabled employees, and has implemented achievable modifications as required by the law. Legal Action has installed Telecommunications Devices for the Deaf in each of its main offices. General client informational handouts are available in Braille and in large print formats.

During 1995, the City of Madison awarded the United Neighborhood Centers, the Madison office landlord, a Community Development Block grant to install an accessible wheelchair entry ramp, restroom and drinking fountain. In 1998, Legal Action upgraded the Milwaukee Office client waiting room to provide a wheelchair-accessible service counter.

Legal Action has been collaborating with various community groups to assure the full access to services for persons with language and other barriers. Legal Action has contracted with Language Line Services to provide on-call interpretation via telephone for most languages of the world, at any time and any place. Legal Action is implementing a Limited English Proficiency Plan throughout all the offices.

6. Overall Recommendations

I recommend that Legal Action continue to give serious attention to enhancing diversity in all aspects of Legal Action's staff and services.

**General Population Data**  
**(39 County Legal Action Service Area)<sup>1</sup>**

**2000 U.S. Census General Population in 39 County Service Area**

<b>Gender</b>	<b>Persons</b>	<b>% of Total</b>
Male	2,070,404	49.30%
Female	2,129,435	50.70%
<b>Race</b>		
White	3,658,782	87.12%
Black or African American	301,221	7.17%
Amer. Indian and Alaska Native	25,577	0.61%
Asian	74,274	1.77%
Native Hawaiian and Other Pacific Islander	1,328	0.03%
Some Other Race	81,527	1.94%
Two or More Races	<u>57,130</u>	<u>1.36%</u>
Total All Races	4,199,839	100.00%
<b>Origin</b>		
Hispanic or Latino of Any Race	182,607	4.35%

**Civilian Labor Force**  
**Legal Action Service Area<sup>1</sup>**

	<b><u>Employed</u></b>	<b><u>Unemployed</u></b>
<b>TOTAL</b>	<b>97.12%</b>	<b>2.88%</b>
Male	97.06%	2.94%
Female	97.19%	2.81%
White	97.74%	2.36%
Black	90.80%	9.20%
Hispanic	91.60%	8.40%
Native American	93.42%	6.58%
Other Minority	95.00%	5.00%

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<sup>1</sup> From Affirmative Action Program Data 2000-2001: DWD. 2002-2003 data was not available as of 12/16/03.

**UNIVERSITY OF WISCONSIN - MADISON  
LAW SCHOOL ENTRY STATISTICS<sup>4</sup>**

<b><u>Entry Year</u></b>	<b><u>Black</u></b>	<b><u>Hispanic</u></b>	<b><u>Native American</u></b>	<b><u>Asian/Pacific Islander</u></b>	<b><u>Women</u></b>
1997	7.00%	5.00%	2.00%	Not Available	44.00%
1998	8.00%	5.00%	2.00%	Not Available	47.00%
1999	7.00%	8.00%	3.00%	10.00%	44.00%
2000	6.00%	4.00%	1.00%	9.00%	51.00%
2001	6.00%	5.00%	4.00%	11.00%	46.00%
2002	11.00%	10.00%	2.00%	7.00%	45.00%
2003	8.50%	9.30%	1.40%	7.00%	45.50%
Average	7.64%	6.61%	2.20%	8.80%	46.07%

The 2003 entry class of Marquette University Law School consisted of 45% females and 8% minorities. This compares with the 2002 entry class totals of 46% female and 7% minority.

**Wisconsin State Bar Membership as of December 2003**

	<b><u>Black</u></b>	<b><u>Hispanic</u></b>	<b><u>Native American</u></b>	<b><u>Asian/Pacific Islander</u></b>	<b><u>Women</u></b>
2002	N/A	N/A	N/A	N/A	27.83%
2003	2.28%	1.58%	0.71%	1.26%	28.41%

### **III. PROGRAM WORKFORCE ANALYSIS**

The Program Staffing Analysis (Attachment A) reflects that the Legal Action staff consists of two general job classifications:

1. **Attorney/Manager** Defined as attorneys (irrespective of administrative or executive); those with supervisory responsibilities in addition to the practice of law; & non-attorney administrators, professionals and office managers.

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<sup>4</sup> All figures from UW-Madison Law School as of October 2003. Asian/Pacific Islander data not provided by law school prior to 1999.

With the January 1997 and August 1997 resignations of two Hispanic attorneys, the percentage of Hispanic professionals had decreased from 6.3% to 0%. In March 1998, Legal Action was able to recruit one Hispanic attorney, so the percentage of Hispanic professionals increased to 2.6%. In 1999, Legal Action was able to recruit two Hispanic supervising attorneys, so the percentage of Hispanic professionals increased from 2.6% to 6.4%. In August 2001, Legal Action provided employees an opportunity to self-identify minority status and two additional attorneys indicated that they were Hispanic. During 2003, one Hispanic relocated out of state and resigned from Legal Action. Another Hispanic attorney did not return from a medical leave. Legal Action's current level is 4.35%. This percentage level is higher than the attorney labor force as reflected by reflected by the Wisconsin State Bar membership data for Hispanic attorneys of 1.58% as of December 2003. Legal Action will continue to strive to expand the utilization of Hispanic professionals/attorneys to meet an equalization between demographics of the client population served and staff makeup. The client population is 10.92% Hispanic or Latino origin.

The percentage of professional attorney Native Americans employed by Legal Action (2.17%). This percentage level is higher than the attorney labor force as reflected by reflected by the Wisconsin State Bar membership data for Native American attorneys of .71% as of December 2003. The client population is 1.50% American Indian and Alaska Native so Legal Action's staff level percentage of 2.17% exceeds the client population

At this time, minorities as a whole comprise 17.39% of the attorney/manager category as compared to 5.83 % of the local labor force. The labor force is defined as the membership of the Wisconsin State Bar. Bar membership is mandatory for all attorneys who wish to practice in Wisconsin.

Legal Action's support staff classification is fairly represented by females. Blacks, Hispanics and other minorities continue to be over-utilized. In addition, minority support staff salaries compare favorably with their white co-workers in this category.

During the period November 2002 to October 2003, the number of Legal Action employees increased by 6 persons, from 91 to 97. The overall number of minority employees decreased by 4, from 32 to 28. The number of minority paralegal/secretary staff decreased by 2 and the number of minority attorneys/managers decreased by 2. The total number of attorney/manager employees increased by 3. On January 1, 2003, merged with two other firms and expanded it's service area by 28 counties and added four branch offices. These 2003 changes had an impact on staff composition and client demographics.

Attachment C presents a summary of attorney diversity data from a wide range of sources and law firm types. Legal Action's overall minority and women diversity levels are some of the highest, as compared to the levels reported by these other sources.

On the basis of the above utilization analysis, Legal Action will continue to pursue diversity within all job categories.

## VI. POSSIBLE DIVERSITY GOAL AND TIMETABLE:

### A. Definitions from Legal Services Corporation EEO/AA Guidelines

C	-	Percentage of minority groups in eligible client population
L	-	Percentage of minority group in work force of relevant labor market area (December 2003 Wisconsin State Bar membership)
S	-	Percentage of minority group in program current work force
G	-	$\frac{C + L + S}{3}$ (Goal)

The diversity goals as set forth below are for those attorney/manger groups where Legal Action's staffing level percentage is below the percentage of the service area client population. For all groups below, Legal Action's staffing level percentage already exceeds the percentage in the labor force.

#### Diversity Goals: Black Attorney / Manager

$$\frac{C + L + S}{3} = \text{Goal}$$

$$\frac{25.03 + 2.28 + 8.70}{3} = 12.00\% \text{ (Goal)}$$

1999 actual level	-	6.39%
2000 actual level	-	6.52%
2001 actual level	-	6.98%
2002 actual level	-	9.30%
2003 actual level	-	8.70%
2004 diversity goal	-	13.04% (+2 positions)

#### Diversity Goals: Asian/Pacific Island Attorney / Manager

$$\frac{C + L + S}{3} = \text{Goal}$$

$$\frac{3.61 + 1.26 + 2.17}{3} = 2.35\% \text{ (Goal)}$$

1999 actual level	-	2.13%
2000 actual level	-	4.35%
2001 actual level	-	2.33%
2002 actual level	-	2.33%
2003 actual level	-	2.17%
2004 diversity goal	-	4.34% (+1 position)



**SUMMARY****PROGRAM STAFFING ANALYSIS****Total Legal Action Workforce\***

<b><u>Sex:</u></b>	<b><u>November 2003 # of Employees</u></b>	<b><u>November 2003 Percentage</u></b>	<b><u>November 2002 # of Employees</u></b>	<b><u>November 2002 Percentage</u></b>
Male	32	32.99%	30	32.97%
Female	<u>65</u>	<u>67.01%</u>	<u>61</u>	<u>67.03%</u>
TOTAL	97	100%	91	100%

**Ethnic Group:**

	<b><u>November 2003 # of Employees</u></b>	<b><u>November 2003 Percentage</u></b>	<b><u>November 2002 # of Employees</u></b>	<b><u>November 2002 Percentage</u></b>
White	69	71.13%	59	64.83%
Black	10	10.31%	12	13.19%
Hispanic	14	14.44%	17	18.68%
Asian/Pacific Island	2	2.06%	1	1.10%
Native Am.	<u>2</u>	<u>2.06%</u>	<u>2</u>	<u>2.20%</u>
Total	97	100%	91	100%

\* 2003 data includes four branch offices added effective January 1, 2003 merger. 2002 data does not include these four offices.

LEGAL ACTION OF WISCONSIN, INC. WORKFORCE ANALYSIS -- NOVEMBER 30, 2003

		ATTORNEY					WR OFF				
		Senior	Associate	Paralegal	Administrative	Other	Attorney	Paralegal	Administrative	Other	Anglo
15	Supervising Attorney	8	0	2	0	0	4	0	0	1	0
25	Other Attorney	6	1	0	0	0	15	2	0	0	1
6	Non-Attorney/Manager	2	0	0	0	0	3	1	0	0	0
Total Attorneys/Managers		16	1	2	0	0	22	3	0	1	1
26	Paralegal	5	0	1	1	0	12	1	6	0	0
25	Secretary/Other	6	0	0	0	0	8	5	5	0	1
Total Support Staff		11	0	1	1	0	20	6	11	0	1
TOTAL STAFF		27	1	3	1	0	42	9	11	1	2

**Summary of Available Attorney Diversity Data**

Attachment C

The ABA's 2002-2003 Goal IX Report Status of Racial and Ethnic Diversity in the ABA.

Year	Black	Hispanic	Native American	Asian/PI	Total Minority	Women
2002 ABA Membership	2.78%	2.27%	.56%	2.59%	9.24% *	N/A

1990 U.S. Census: Legal Profession (as reported on page 12 of above ABA report)

Black	Hispanic	Native American	Asian/PI	Total Minority	Women
3.36%	2.49%	.19%	1.41%	7.45%	N/A

University of Wisconsin - Madison (Average 1997 - 2003)

	Black	Hispanic	Native American	Asian/PI	Total Minority	Women
Law School Entry Class: Fall 2003	8.50%	9.30%	1.40%	7.00%	26.20%	45.50%

Marquette University (Entry Class 2003)

Black	Hispanic	Native American	Asian/PI	Total Minority	Women
Law School Entry Class: Fall 2003	N/A	N/A	N/A	8.00%	45.00%

Wisconsin State Bar Association as of November 2003

	Black	Hispanic	Native American	Asian/PI	Total Minority	Women
Licensed Attorneys	2.28%	1.58%	.71%	1.26%	6.95%	28.41%

The abbreviation "PI" refers to Pacific Islander.

\* Includes other minority of 1.04%.

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**Legal Action of Wisconsin, Inc. as of 11/30/03**

	<b>Black</b>	<b>Hispanic</b>	<b>Native American</b>	<b>Asian/PI</b>	<b>Total Minority</b>	<b>Women</b>
<b>All Attorneys</b>	<b>8.70%</b>	<b>4.35%</b>	<b>2.17%</b>	<b>2.17%</b>	<b>17.36%</b>	<b>58.70%</b>

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**Legal Services Corporation Programs: Nationwide as of 12/31/01**

	<b>Black</b>	<b>Hispanic</b>	<b>Native American</b>	<b>Asian/PI</b>	<b>Total Minority</b>	<b>Women</b>
<b>All Attorneys</b>	<b>13.16%</b>	<b>11.05%</b>	<b>.71%</b>	<b>3.20%</b>	<b>28.54% **</b>	<b>57.14%</b>

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**\*\* Includes other minority attorneys: .38%**

**Q:\Admin\POLICY\EO\2003\UTILIZATION ANALYSIS 11-03.WPD**

Opinions : DWD

Attachment 8

LEP by County

The following counties and languages are the initial opinions of LEP translation in Wisconsin. There are a few inconsistencies between census and DPI data, but for the most part, the data in its entirety confidently shows where the greatest translation needs are given the thresholds.

- Brown County LEP - Spanish
- Dane County LEP- Spanish and Hmong
- Jefferson County LEP- none
- Kenosha County LEP - Spanish
- Marathon County LEP- Hmong
- Milwaukee County LEP- Spanish and Hmong
- Outagamie County LEP - Spanish and Hmong
- Racine County LEP - Spanish
- Rock County LEP - Spanish
- Sheboygan County LEP - Spanish and Hmong
- Walworth County LEP - Spanish
- Waukesha County LEP - Spanish
- Winnebago County LEP - Spanish

### **Methodology and Opinion**

English translations of official written materials, including vital documents, are provided for each non-English language contingent that constitutes 10 percent or 3,000 residents, whichever is less, of a county's population. Another threshold of five percent or 1,000 residents, whichever is less, dictates that only vital documents, at the minimum, are translated into written form and that translation of other forms may be provided orally. Non-English language speakers that constitute lower than these thresholds are provided notice of the right to receive oral translation of written materials in their native language. The following data do not outline the lowest thresholds that many other Wisconsin counties meet with total numbers of LEP less than 1,000. This is expected to be outlined later. The phrase, "Limited English Proficiency" or **LEP**, in this data is assumed to indicate the sum of individuals five years of age and older who "speak English 'not well'" and "speak English 'not at all'". No county in Wisconsin meets any translation standards by the percentage thresholds, but 13 counties in the state have a significant LEP population(s) that meet criteria by numerical volume.

The data examine 13 Wisconsin counties' population with limited English language proficiency. The data are from the 2000 Census Summary File-4 (SF-4) table QT-P17, supplemented with data from table QT-P16 from Summary File-3 (SF-3). These census data are then associated with data from a survey of school children by the Wisconsin Department of Public Instruction (DPI), which measured the number of school children challenged with understanding the English language. The comparison of the census data to that of the DPI is used to further confirm the predominance of specific native languages within a county's population. DPI criteria for LEP designation are outlined in <http://www.dpi.state.wi.us/ell/pdf/lep0203.pdf> and are not necessarily assumed to be measured or determined to be the same as the census designation, but are considered similar for the purposes of this information gathering. A cautionary note to the DPI data is that the data is aggregated at the school district level, which may be comprised of multiple counties or parts of counties. The school district data has been assigned to the predominant county within the district and is taken into consideration of the final LEP "opinion". Again, the phrase, "Limited English Proficiency" or **LEP**, in this data is assumed to indicate the sum of individuals five years of age and older who "speak English 'not well'" and "speak English 'not at all'". Census data only display the number of LEP in broad language categories (Asian and Pacific Island languages, Other Indo-European languages, and All Other languages) with the exception of Spanish, which is a specific language. Due to census' broad grouping of languages, one can only estimate the specific languages spoken by LEP as no publicly available census data will show ability to speak English in conjunction with one's specific native language, except for Spanish. Only inferences can be drawn to determine the specific languages spoken by LEP.

The spreadsheet outlines the 13 Wisconsin counties that meet a volume threshold using a minimum of 1,000 total LEP without initial consideration of the LEP' specific, native language(s). Data from SF-4 table QT-P17 helps to infer native language(s) by allowing the examination of the race/ethnicity/ancestry of the LEP population. SF-4, in its entirety, allows one to see the myriad census data including the LEP population in different contexts of 336 population groups including: 132 race groups, 78 American Indian and Alaska Native tribe categories (reflecting 39 individual tribes), 39 Hispanic or Latino groups, and 86 ancestry groups. *The census LEP figures in the context of race/ethnic/ancestry figures still only account for broad language groups (other than Spanish and English), but by drilling down to detailed race/ethnic/ancestry groups one may assume specific native language because of known languages common to these detailed groups.* A limitation of this data is that census cannot disclose any population data of a particular race/ethnicity/ancestry if it numbers fewer than 50 in a given geography. This may not be a factor for this study due to the high thresholds for translation, but this could be a

- Jefferson County LEP- none
- Kenosha County LEP - Spanish
- Marathon County LEP- Hmong
- Milwaukee County LEP- Spanish and Hmong
- Outagamie County LEP - Spanish and Hmong
- Racine County LEP - Spanish
- Rock County LEP - Spanish
- Sheboygan County LEP - Spanish and Hmong
- Walworth County LEP - Spanish
- Waukesha County LEP - Spanish
- Winnebago County LEP - Spanish

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X
	2000 Total Population	2000 Population - Ages 5 yrs. and Older	5% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	% LEP - Ages 5 yrs. and older over population											Government Agency or Establishment with 100 LEP in 2000					
DAINE	426,528	401,056	21,226	42,453	20,053	40,106	7,112	1.6%										Vietnamese Russian					

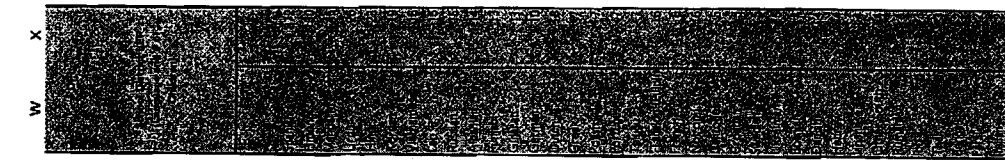
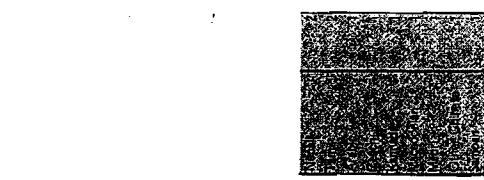




A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	W	X
	2000 Total Population	2000 Population - Ages 5 yrs. and Older	5% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	% LEP - Ages 5 yrs. and older are Total LEP											Comments: Agency or Responsible for under 100 LEP in 2000				
MILWAUKEE	840,164	873,148	47,008	94,016	43,887	87,215	25,648	2.9%										Japanese				



[illegible]



A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X

																			comment: Ancestry or Race/Ethnicity Just under 100 LEP in 2000				
																			Korean, Japanese, Vietnamese, Cuban, Polish				

A	B	C	D	E	F	G	H	I
	2000 Total Population	2000 Population - Ages 5 yrs. and Older	% of Total Population	10% of Total Population	% of Population Ages 5 yrs. and Older	10% of Population Ages 5 yrs. and Older	% LEP - Ages 5 yrs. and older over population	
WAUKESHA	260,787	237,644	18,038	38,077	14,638	33,768	2,824	0.9%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
Waukegan	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

2000 Total Population	2000 Population - Ages 5 yrs. and Older	8% of Total Population	10% of Total Population	5% of Population - Ages 5 yrs. and Older	10% of Population - Ages 5 yrs. and Older	5 LEP - Ages 5 yrs. and older over total population		
							Total LEP population	
WAUKESHA	340,747	337,464	18,038	38,077	16,888	33,768	2,884	0.8%

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
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Table 5. Detailed List of Languages Spoken at Home for the Population 5 Years and Over by State: 2000 - continued

Language	Pennsylvania	Rhode Island	South Carolina	South Dakota	Tennessee	Texas	Utah	Vermont	Virginia	Washington	West Virginia	Wisconsin	Wyoming
5 years and over	11,555,538	985,184	3,748,869	703,820	5,315,920	19,241,518	2,023,875	574,842	8,819,266	5,301,398	1,706,931	5,022,073	462,809
Speak only English	10,593,054	788,580	3,552,240	658,245	5,059,404	13,230,765	1,770,626	540,787	5,884,075	4,730,512	1,661,036	4,853,361	433,324
Speak other language	972,484	196,604	196,629	45,575	256,516	6,010,753	253,249	34,075	735,191	770,886	45,895	368,712	29,485
Spanish or Spanish Creole	356,754	79,443	110,030	10,052	133,931	5,195,182	150,244	5,791	316,274	321,480	17,652	168,778	18,606
Other Indo-European languages	428,122	91,449	55,116	19,510	68,879	358,019	49,865	24,334	195,846	176,722	19,491	124,719	8,391
French (incl. Patois, Cajun)	47,735	19,385	19,110	1,256	17,557	62,274	7,905	14,624	40,117	22,385	6,693	14,970	1,618
French Creole	4,782	4,337	249	21	510	3,504	194	25	2,665	316	38	150	6
Italian	70,434	13,758	3,091	296	3,134	11,158	2,814	1,188	10,098	6,185	2,815	6,774	363
Portuguese or Portuguese Creole	8,346	37,437	1,214	100	1,259	9,718	5,715	292	5,563	2,874	235	903	238
German	68,672	2,841	15,195	13,422	20,287	82,117	12,095	2,612	32,736	39,702	5,040	48,409	2,382
Yiddish	5,444	474	139	2	327	905	49	41	595	423	68	485	0
Other West Germanic languages	51,073	629	1,372	377	2,101	7,286	2,544	389	4,037	4,618	299	5,870	197
Scandinavian languages	3,318	726	759	1,024	613	6,583	3,281	415	3,407	10,695	204	5,651	358
Greek	17,348	1,858	2,566	134	1,413	6,571	1,927	319	6,866	2,801	912	2,563	181
Russian	32,169	1,922	1,818	411	2,928	11,574	3,093	554	9,147	31,339	371	5,362	172
Polish	31,717	2,866	1,135	185	1,398	9,652	819	977	3,515	4,287	763	12,097	199
Serbo-Croatian	8,648	169	330	573	1,765	6,731	3,190	1,600	3,358	4,935	265	4,988	99
Other Slavic languages	24,423	379	868	1,055	1,288	15,448	897	359	2,864	15,598	487	3,620	163
Armenian	2,271	1,595	36	8	113	1,172	604	64	1,192	675	7	474	5
Persian	3,703	334	541	89	1,940	17,558	1,054	66	19,199	5,314	320	1,098	0
Gujarathi	8,957	226	2,101	53	2,494	19,140	117	57	4,059	1,016	165	817	124
Hindi	10,045	531	1,325	112	2,023	20,919	875	214	11,947	5,188	429	2,294	44
Urdu	5,084	167	648	53	1,319	32,978	675	88	15,250	1,874	349	1,717	58
Other Indic languages	12,297	653	1,345	108	2,170	24,454	696	114	13,767	8,717	806	2,735	99
Other Indo-European languages	11,656	1,071	1,476	233	4,260	8,277	1,221	326	5,443	7,982	225	3,742	85
Asian and Pacific Island languages	143,955	19,926	25,534	3,053	39,701	374,330	37,805	3,015	170,136	242,838	6,038	61,447	2,117
Chinese	42,790	3,882	5,648	569	7,492	91,500	7,093	782	29,837	48,459	1,634	7,951	512
Japanese	7,202	747	2,807	298	4,423	14,701	5,032	332	8,019	24,055	1,135	3,184	518
Korean	25,978	1,433	3,294	314	6,550	38,451	3,214	323	39,636	39,522	581	4,075	347
Mon-Khmer, Cambodian	8,710	5,586	411	62	1,293	7,870	1,528	114	4,872	14,559	0	558	0
Miao, Hmong	880	1,117	1,008	5	263	180	237	0	59	1,563	0	30,569	0
Thai	2,067	240	771	203	1,159	7,282	835	145	3,738	4,064	167	906	46
Laotian	2,249	3,195	1,031	231	4,496	10,378	2,222	80	2,878	6,545	7	3,314	9
Vietnamese	25,880	1,006	3,772	553	6,625	122,517	5,202	812	31,918	39,829	472	3,210	49
Other Asian languages	16,196	958	1,576	235	2,938	32,780	761	182	12,115	6,387	784	3,054	82
Tagalog	9,604	1,532	4,496	457	3,386	39,988	2,683	140	33,598	41,674	970	3,144	340
Other Pacific Island languages	2,399	230	720	126	1,076	8,683	8,998	105	3,466	16,199	288	1,444	214
Other languages	43,653	5,806	5,749	12,980	14,005	83,222	15,335	936	52,935	29,838	2,714	13,768	2,371
Navajo	41	0	28	56	49	595	9,373	0	133	448	53	19	180
Other Native North American languages	1,190	169	278	11,246	913	3,603	1,499	89	1,069	4,151	209	4,210	1,795
Hungarian	6,168	216	396	31	564	2,140	433	88	1,763	1,592	322	982	26
Arabic	19,557	2,088	2,440	384	6,482	32,909	1,653	282	25,984	6,489	1,583	4,088	142
Hebrew	5,918	437	682	0	823	4,622	256	139	1,301	1,561	198	1,043	33
African languages	9,673	2,591	1,341	1,042	4,480	36,087	1,370	198	21,164	12,420	271	1,878	103
Other and unspecified languages	1,108	317	584	201	694	3,266	751	161	1,521	3,179	98	1,548	92

Attachment 9